

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

NO. 1:16-cv-03088-ELR

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**CASSANDRA HOLIFIELD, PH.D.**

*December 01, 2022*

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UNITED STATES vs STATE OF GEORGIA

December 01, 2022

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
STATE OF GEORGIA,  
Defendants.  
- - - - -

) CIVIL ACTION  
) NO. 1:16-cv-03088-ELR  
)  
)  
)  
)  
)  
)  
)

VIDEOTAPE DEPOSITION OF  
CASSANDRA HOLIFIELD, Ph.D.

Thursday, December 1, 2022, 9:14 a.m., EST

HELD AT:

Parker Poe  
1075 Peachtree Street, N.E., Suite 1500  
Atlanta, Georgia 30309

-----  
WANDA L. ROBINSON, CRR, CCR, No. B-1973  
Certified Shorthand Reporter/Notary Public

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1  
2 ALSO PRESENT VIA ZOOM:

3 U.S. Attorney's Office:

4 FRANCES COHEN, ESQUIRE

5 RENEE WOHLLENHAUSE, ESQUIRE

6 VICTORIA LILL, ESQUIRE

7 ANDREA HAMILTON, ESQUIRE

8 LAURA CASSIDY TAYLOE, ESQUIRE

9 CRYSTAL ADAMS, ESQUIRE

10  
11  
12 STACEY SUBER-DRAKE, ESQUIRE

13 CHANTEL MULLEN, ESQUIRE

14 Georgia Department of Education  
15  
16  
17  
18  
19  
20

21 ALSO PRESENT:

22 MAYA CARTER, Videographer  
23  
24  
25

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1 THE VIDEOGRAPHER: Today's date is  
2 December 1st, 2022, and the time is 9:14 a.m.

3 This will be the videotape deposition of  
4 Dr. Cassandra Holifield in the matter of the  
5 United States of America versus the State of  
6 Georgia, taken at 1705 Peachtree Street,  
7 Northeast, Suite 1500, in Atlanta, Georgia.

8 Would counsel please identify themselves  
9 for the record.

10 MS. GARDNER: Kelly Gardner for the United  
11 States.

12 MS. COHEN: Claire Chevrier for the United  
13 States.

14 MS. MORRIS: Beth Morris on behalf of  
15 North Metro RESA.

16 MS. JOHNSON: Melanie Johnson for the  
17 State of Georgia.

18 - - - - -

19 CASSANDRA HOLIFIELD, Ph.D.,  
20 being duly sworn, was examined and testified as  
21 follows:

22 - - - - -

23 EXAMINATION

24 BY MS. GARDNER:

25 Q Good morning, Dr. Holifield.

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1 A Good morning.

2 Q Him are you?

3 A Good.

4 Q My name is Kelly Gardner and I represent  
5 the United States. I'm going to be taking your  
6 deposition today.

7 Would you please state your full name for  
8 the record.

9 A Dr. Cassandra Allen Holifield.

10 Q Dr. Holifield, have you ever been deposed  
11 before?

12 A Yes.

13 Q How many times have you been deposed?

14 A Too many. I don't know. Three, four. I  
15 don't know.

16 Q When was your most recent deposition?

17 A I think a couple of months ago.

18 Q Okay. And what was that deposition taken  
19 in connection with?

20 A The State of Georgia lawsuit against  
21 GNETS.

22 Q The GNETS litigation?

23 A The GNETS.

24 Q And to be clear, that deposition was not  
25 taken by the United States; is that right?

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1 A No. I think it was the State of Georgia,  
2 GAO.

3 Q Do you understand GAO to be the Georgia  
4 Advocacy Office?

5 A Yes.

6 Q So that deposition was taken by GAO?

7 A Yes.

8 Q The other depositions that you have been a  
9 part of, generally what's been the nature or subject  
10 matter of those litigations?

11 A GNETS.

12 Q GNETS. Am I correct that you are being  
13 represented today by Ms. Morris, for purposes of  
14 your deposition?

15 A Yes.

16 Q I'm sure that Ms. Morris has explained  
17 much of this to you, but today you and I are  
18 basically going to have a conversation. I'm going  
19 to ask the questions and your only job is to answer  
20 them honestly and completely.

21 Do you understand that?

22 A Yes.

23 Q The court reporter has sworn you in. That  
24 means that everything you say here today is under  
25 oath and must be truthful. Do you understand that?

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1 A Yes.

2 Q The court reporter is going to write down  
3 what you and I say in order to create a transcript  
4 of our conversation. She can't record a nod or a  
5 shake of your head. So in order to make her job  
6 easier, I'm going to ask that you speak clearly and  
7 that you give oral answers.

8 Can we agree on that?

9 A Yes.

10 Q The other thing that you and I are going  
11 to need to do is try to avoid talking over one  
12 another. I'm going to do my best not to interrupt  
13 you when you're answering, and I'm going to ask you  
14 to do your best to let me finish my question before  
15 you start to answer. Okay?

16 A Yes.

17 Q If at any point you don't understand a  
18 question that I ask, you should feel free to stop me  
19 and ask me to clarify. I'm happy to try to reframe  
20 the question. Okay?

21 A Yes.

22 Q If you need a break at any time, just let  
23 me know or tell your attorney. If you're in the  
24 middle of answering a question, I'll ask that you  
25 finish that question and then we'll see what we can

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1 do about a break. Okay?

2 A Yes.

3 Q Sometimes it may happen that you give an  
4 answer as completely as you can, and then later on,  
5 maybe five minutes, an hour later, you may remember  
6 some additional information in response to that  
7 question. If that happens, just let me know that  
8 you would like to add something to an earlier  
9 question and we'll give you an opportunity to do  
10 that. Okay?

11 A Okay.

12 Q Is there any reason you can think of why  
13 you will not be able to answer my questions  
14 completely and truthfully today?

15 A No.

16 Q Do you have any questions for me before we  
17 proceed?

18 A No.

19 Q Okay.

20 MS. GARDNER: Beth, we have typically  
21 agreed with the State of Georgia in these  
22 depositions that all objections except as to  
23 form and privilege are reserved until trial.

24 Is that okay with you?

25 MS. MORRIS: That's agreeable.

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1 MS. GARDNER: Okay.

2 BY MS. GARDNER:

3 Q Dr. Holifield, did you do anything to  
4 prepare for today's deposition?

5 A I just do my job.

6 Q Okay. Did you meet with counsel?

7 A Yes.

8 Q How long did you meet with counsel for?

9 A 15 minutes.

10 Q Did you meet with anyone other than  
11 counsel in preparation for today's deposition?

12 A No.

13 Q Have you talked to anyone other than  
14 counsel about today's deposition?

15 A No.

16 Q Did you review any documents in  
17 preparation for today's deposition?

18 A No.

19 Q Have you talked with any other GNETS  
20 depositions -- GNETS directors about your deposition  
21 or theirs?

22 A No.

23 Q Have you reviewed any other deposition  
24 transcripts in this matter?

25 A No.

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1 (WHEREUPON, Plaintiff's Exhibit-626 was  
2 marked for identification.)

3 BY MS. GARDNER:

4 Q Dr. Holifield, I'm going to hand to you  
5 what has been marked as Plaintiff's Exhibit 626.

6 This is a subpoena to testify at a  
7 deposition in a civil action, and the subpoena is  
8 directed to Cassandra Holifield.

9 That's you, correct?

10 A Yes.

11 Q Have you seen this document before?

12 A Yes.

13 Q And when were you provided with this  
14 document?

15 A It says December 1st.

16 Q That's today's date?

17 A I don't recall.

18 Q But you have seen this document before?

19 A Yes.

20 Q The top of the document has the case name  
21 United States versus Georgia. Do you see that?

22 A Yes.

23 Q Do you understand that this deposition is  
24 being taken in connection with litigation against  
25 the State of Georgia?



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1 A Yes.

2 Q And do you understand that the litigation  
3 relates to the Georgia Network for Educational and  
4 Therapeutic Supports program?

5 A Yes.

6 Q Are you aware that that program is more  
7 commonly referred to as the GNETS program?

8 A Yes.

9 Q So if I use the term "GNETS," you will  
10 understand that to mean the Georgia Network for  
11 Education and Therapeutic Support program?

12 A Yes.

13 Q When did you first learn of this  
14 litigation?

15 A I started the job in 2012 and it was six  
16 months after that, so.

17 Q Okay.

18 A Yeah.

19 Q And how did you learn of this litigation?

20 A I think we had a meeting with the DOE and  
21 they shared the information with us.

22 Q And when you say "we had a meeting," who  
23 is "we"?

24 A The Georgia network -- the directors for  
25 GNETS.

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1 Q So all of the GNETS directors had a  
2 meeting with the Georgia Department of Education  
3 about this litigation?

4 A Yes.

5 Q Who from the Georgia Department of  
6 Education was present at that meeting?

7 A I don't recall. That's 10 years ago. I  
8 don't recall.

9 Q Okay. Was -- would Nakeba Rahming have  
10 been at that meeting?

11 A I don't think she had started at that  
12 time.

13 Q And what was -- what was discussed at that  
14 meeting?

15 A Just the lawsuit and they shared the  
16 document that I guess was shared with the DOE. So  
17 they gave us an overview of what the letter said.

18 Q Okay. And in terms of your understanding  
19 after that meeting, what did you understand the  
20 litigation to be about?

21 A GNETS and equity issues.

22 Q And when you say "equity issues," what do  
23 you mean by that?

24 A I think based on the paperwork, there were  
25 some concerns that GNETS kids didn't have access.

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1 Q And when you say "access," access to what?

2 A Some of the same things as typical peers.

3 Q Okay. Is there anything else that you  
4 understand about the nature of this lawsuit that you  
5 haven't told me about yet?

6 A Not -- no, not that I can think of right  
7 now.

8 Q In the course of this lawsuit did the  
9 North Metro GNETS program receive a subpoena from  
10 the United States requesting that it provide certain  
11 documents about its regional GNETS program?

12 A Yes.

13 Q Were you involved in responding to that  
14 subpoena?

15 A Yes.

16 Q What role did you play?

17 A Gathering the documents.

18 Q So I take it that you're familiar with the  
19 documents that were collected and produced in  
20 response to that subpoena?

21 A Yes.

22 Q When did you first become acquainted with  
23 the GNETS program?

24 A Again, I think I started in 2012. So I  
25 worked at the DOE before that as a state consultant,

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1 so I knew of GNETS, but my role in the GNETS  
2 specifically was in 2012.

3 Q So in 2012, you first became sort of  
4 personally involved with GNETS?

5 A Yes.

6 Q But it sounds like you worked at the  
7 Georgia Department of Education previously, so you  
8 were generally familiar with GNETS as a program?

9 A Yes.

10 Q What is the GNETS program?

11 A Georgia Network for Educational and  
12 Therapeutic Supports is a part of the full continuum  
13 of services with students with disability, part of  
14 IDEA, where we provide academic behavior on  
15 therapeutic support services to kids who aren't able  
16 to get everything that they need in a traditional  
17 program.

18 Q When you say kids who aren't able to get  
19 everything they need in a traditional program, is  
20 there a particular target population of students for  
21 GNETS?

22 A There's no target, it's a referral process  
23 from the IEP team.

24 Q How is the overall network structured?

25 A Can you clarify what you are asking?

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1 Q I'm just trying to understand like from a  
2 statewide prospective, it's called the Georgia  
3 Network for Educational and Therapeutic Supports  
4 program, so I'm just wondering what is the network  
5 and what does that look like, how is it structured?

6 A There are 24 programs across the State of  
7 Georgia. My understanding is they're all about 50  
8 miles away from each other. So we all serve  
9 students within the State of Georgia who need more  
10 therapeutic and mental health and behavioral  
11 supports.

12 Q Okay. And those 24 programs, are those  
13 referred to as regional GNETS programs?

14 A I'm not really sure.

15 Q Okay.

16 A Okay. Sorry.

17 Q The 24 programs, do they, in terms of the  
18 students that they serve, is it sort of organized by  
19 geography?

20 A Yes.

21 Q Okay.

22 A Yes.

23 Q I may be using some acronyms today for  
24 brevity, so I want to go through a few of them to  
25 make sure you and I are on the same page. Okay?

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1 A Okay.

2 Q If I use the term "Georgia DOE," will you  
3 understand that to be the Georgia Department of  
4 Education?

5 A Yes.

6 Q If I use the term "LEA," will you  
7 understand that to be local education agency?

8 A Yes.

9 Q If I use the term "RESA," will you  
10 understand that to be Regional Educational Service  
11 Agency?

12 A Yes.

13 Q If I use the term "GNETS centers," will  
14 you understand that to mean standalone GNETS  
15 locations?

16 A Yes.

17 Q If I use the term "GNETS school-based  
18 locations," will you understand that to mean GNETS  
19 locations that are based in general education  
20 settings?

21 A Yes.

22 Q If I use the term "PBIS," will you  
23 understand that to be positive behavioral  
24 interventions and supports?

25 A Yes.

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1 Q If I use the term "EBD," will you  
2 understand that to mean emotional and behavioral  
3 disabilities?

4 A Yes.

5 Q And if I use the term "general education  
6 settings," will you understand that to mean public  
7 schools in Georgia where children with EBD and other  
8 behavioral health conditions receive instruction and  
9 services alongside children who do not have  
10 disabilities?

11 A Can you repeat that again because I heard  
12 part of it?

13 Q Why don't you tell -- why don't you tell  
14 me this, what do you understand to be a general  
15 education setting?

16 A A general education setting is a  
17 traditional K-12 school setting where both students  
18 with disabilities and students without disabilities  
19 receive academic supports.

20 Q Okay. So if I use the term "general  
21 education settings," we will understand that to be  
22 what you have just said.

23 A Okay.

24 Q Okay.

25 MS. GARDNER: I'm going to ask the court

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1 reporter to please mark this document as  
2 Plaintiff's Exhibit 627.

3 (WHEREUPON, Plaintiff's Exhibit-627 was  
4 marked for identification.)

5 BY MS. GARDNER:

6 Q Dr. Holifield, you have been handed what's  
7 been marked as Plaintiff's Exhibit 627. Do you  
8 recognize this document?

9 A Yes.

10 Q And what is this?

11 A My resume.

12 Q This is a current version of your resume?

13 A Yes.

14 Q And you are currently the director of the  
15 North Metro GNETS program, correct?

16 A Yes.

17 Q How long have you been director at North  
18 Metro GNETS?

19 A 10 years.

20 Q And am I correct that you began your  
21 tenure as director in 2012?

22 A Yes.

23 Q Do you hold any educational degrees?

24 A Yes.

25 Q And what are those degrees?



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1           A     I have my doctorate in special education,  
2     autism, behavioral disorders, specific learning  
3     disabilities, and also my master's in the same.

4                     I also have -- my bachelor's is in  
5     psychology.

6                     I have also a leadership degree as well,  
7     and other certifications.

8           Q     Okay. Where did you obtain your  
9     bachelor's degree?

10          A     University of Tennessee Chattanooga.

11          Q     I'm sorry, did you say Chattanooga?

12          A     Yes.

13          Q     Okay. And what about the master's degree?

14          A     Georgia State University.

15          Q     And your doctorate degree?

16          A     Georgia State University.

17          Q     I believe you said you had a leadership  
18     endorsement as well?

19          A     Yes.

20          Q     Where?

21          A     West Georgia.

22          Q     West Georgia, okay.

23                     Do you hold any other professional  
24     licenses apart from your educational degrees?

25          A     I have a registered behavioral technician

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1 certification, which is under the BACB, the  
2 Behavioral Certification Board.

3 Q Okay. When did you -- and is that  
4 referred to sometimes as RBT?

5 A Yes.

6 Q When did you obtain that?

7 A Maybe about three or four years ago. I  
8 can look on here and see but...

9 Q Okay. Three or four years ago.

10 Do you hold any other credentials that are  
11 relevant to your work as a director of a regional  
12 GNETS program?

13 A I have a certification in all of the  
14 content areas, ELA, math, science, reading, and I  
15 also have online teaching endorsement degree.

16 Q Anything else?

17 A Not that I can recall.

18 Q To whom do you report directly as director  
19 of the North Metro GNETS program?

20 A Dr. Leigh Ann Putman is my RESA director.

21 Q And you said -- is it Ms. Putman?

22 A Putman, yes.

23 Q Is her -- her title is director of RESA?

24 A Executive director of Metro RESA.

25 Q Executive Director of Metro RESA.

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1 Does anyone report to you?

2 A Yes.

3 Q How many people report to you?

4 A Leadership or teachers? My direct  
5 reports, I have eight coordinators that report to  
6 me, and then the teachers and the paras also fall  
7 under my leadership, but my coordinators provide the  
8 direct supervision for them as well.

9 Q So you have eight direct reports?

10 A Yes.

11 Q And those are your coordinators of North  
12 Metro GNETS site locations?

13 A Yes.

14 Q And then there would be additional  
15 teachers and paraprofessionals who report to each of  
16 those eight coordinators?

17 A Yes, along with me, and I have school  
18 psychologists, social workers as well.

19 Q The school psychologists and the social  
20 workers, do they report to your coordinators or do  
21 they report directly to you?

22 A Both. They have direct contact with the  
23 coordinators and the schools they serve, and then I  
24 oversee that.

25 Q Okay. And how many social workers is

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1 that?

2 A Right now I have five.

3 Q And how many psychologists?

4 A Right now I have three.

5 Q Does anyone report to you who is not a  
6 part of the staff of North Metro GNETS program?

7 A No.

8 Q What are your duties as the director of  
9 the North Metro GNETS program?

10 A To oversee the program, to make sure that  
11 all students that are in our -- receiving services  
12 in our program get the services that are in their  
13 IEP, and to make sure that they're implemented with  
14 fidelity.

15 Q And when you say to make sure they're  
16 implemented with fidelity, how do you do that?

17 A I inspect what I expect. We go through  
18 IEP meetings.

19 I'm sorry.

20 I go to IEP meetings and we monitor IEPs.  
21 We look at progress data and we just make sure that  
22 if there are any adjustments or different  
23 interventions that need to be implemented, we as a  
24 team go in and make those adjustments as necessary.

25 Q When you say "we monitor IEPs," how do you

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1 monitor IEPs?

2 A Well, data is collected, first of all, for  
3 academic and behavioral goals, and then we collect  
4 progress monitoring data on that throughout the year  
5 to make sure kids are making progress.

6 Q And what kind of data is collected on  
7 academic and behavioral goals?

8 A It depends on the actual goal.

9 Q Okay. Is there some system or form on  
10 which you collect that data?

11 A A form?

12 Q I'm just wondering, I understand that the  
13 data for any particular student may be different,  
14 but is there some common system or set of forms or  
15 way that you collect that data for students  
16 generally?

17 A Well, I mean we use Catalyst as one of the  
18 programs that we use with our students with autism.  
19 But we also use ABA data collection, applied  
20 behavior analysis, using spreadsheets.

21 Q Okay. And when you say you also look at  
22 progress data, would that progress data fall into  
23 the same categories as what you've just listed,  
24 Catalyst, ABA, data collection? Are those the sorts  
25 of things that you would look at along the way for

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1 progress --

2 A Yes.

3 Q -- monitoring?

4 A Yes. And that's mostly behavioral. We  
5 look at different academic data.

6 Q Okay. And in terms of the academic data  
7 you look at, what kind of data is that?

8 A We work with the school system, since  
9 we're part of the school. So our different school  
10 systems, whatever they use academically, that's what  
11 we also use.

12 Q Okay. I'd like to direct your attention  
13 to Page 2 of your resume. I just had a couple of  
14 questions about the contents in terms of the  
15 description of your role as GNETS director.

16 You mention at the end of that section, on  
17 Page 2, that you "steered company through  
18 complicated re-organization, resulting in annual 20%  
19 reduction in operational costs."

20 Do you see that?

21 A Yes.

22 Q What is the reorganization that you  
23 reference here?

24 A Basically what happens is we look at the  
25 needs of our students and our staff population. We

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1 restructure based on the needs of that. So I now  
2 have behavioral specialists that are -- they oversee  
3 the supports in each of my respective school  
4 districts.

5 So instead of -- they are also itinerate  
6 for the different districts, but it helps us to  
7 target the needs of the students directly.

8 Q So the reorganization had to do with  
9 deploying behavioral specialists as sort of in the  
10 management model --

11 A Right -- and also the curriculum  
12 specialists as well.

13 Q We're talking over each other. We're  
14 going to make the court reporter mad.

15 So that is clear on the record, the  
16 reorganization had to do both with deploying  
17 behavioral specialists in the management model that  
18 North Metro GNETS employs, and you added also  
19 curriculum specialists as well?

20 A Yes. And also my social workers and  
21 school psychologists. So everybody has more than  
22 one school that they serve, but I try to restructure  
23 so all of my staff that's in Atlanta Public Schools,  
24 we follow their curriculum and their guidance but  
25 they understand the expectations of the school

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1 district.

2 So that model where I have behavioral  
3 specialists that serve Atlanta Public Schools only,  
4 Fulton County Schools only, Atlanta Public Schools  
5 only. And so the school social worker, school  
6 psychologists, all of that are aligned with the  
7 expectations of the school districts as well.

8 Q So it sounds like what you did was to  
9 centralize your behavioral specialists and  
10 curriculum specialists so they are focused in a  
11 single school district and they can master --

12 A Yes.

13 Q -- that particular school district's  
14 personality, for lack of better words, but the  
15 things that that particular school system does and  
16 is aiming to do?

17 A Yes.

18 Q How did you achieve 20 percent reduction  
19 in operational costs?

20 A By better utilizing my staff and their  
21 expertise and everything. And so using that model,  
22 we were able to really save on costs but we were  
23 also able to better target the needs of our  
24 students.

25 Q You also mention in the same section, and



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1 this is at the top of Page 2, that you increased  
2 "employee effectiveness by 25%."

3 Do you see that?

4 A Yes.

5 Q And how, how have you measured that?

6 A Staff evaluations and also we have a GNETS  
7 Strategic Plan that I monitor data of how the  
8 progress of our program is doing annually. It's  
9 actually more than annually. We look at it over --  
10 at least three times a year.

11 Q Okay. So part of how you are assessing  
12 employee effectiveness is based on the GNETS  
13 Strategic Plan?

14 A Yes.

15 Q And then you also said you assess employee  
16 effectiveness through staff evaluations?

17 A Yes.

18 Q And are those evaluations that are  
19 conducted of staff performing work in the North  
20 Metro GNETS program?

21 A Yes.

22 Q Who conducts those evaluations?

23 A I conduct the evaluations on all my  
24 leadership levels, so coordinator level. My  
25 coordinators are all evaluators as well that have

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1 been certified in TKES and LKES, and they evaluate  
2 the teachers and the paraprofessionals directly under them.

3 Q And you mentioned TKES and LKES. That's  
4 TKES, T-K-E-S, and LKES, L-K-E-S?

5 A Yes.

6 Q What is TKES?

7 A Teacher evaluation system. And leader  
8 evaluation system is the...

9 Q How does that evaluation system -- is that  
10 some sort of universal evaluation system? Where  
11 does the system come from?

12 A The State of Georgia. Georgia Department  
13 of Education.

14 Q Okay. Do you ever evaluate any teachers?

15 A I only evaluate teachers if there's a  
16 problem. So if a teacher is underperforming, the  
17 coordinators and I will bring -- I will come in on  
18 that level, help conduct the direct observations and  
19 provide support, coaching and support.

20 Q Okay. We may come back to evaluations  
21 later.

22 Before serving as director of the North  
23 Metro GNETS program, where did you work?

24 A I was the director of Northwest Georgia  
25 Learning Resources System, GRLS.

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1 Q Okay. Am I correct according to your  
2 resume you were the director of the Northwest  
3 Georgia Learning Resources System from 2003 to 2011?

4 A Yes.

5 Q Who was your actual employer when you were  
6 with the GLRS?

7 A On -- Northwest Georgia RESA.

8 Q In your capacity as director of the  
9 Northwest GLRS, did you work at all with the  
10 Northwest Georgia GNETS program?

11 A Yes.

12 Q And in what ways did you work with that  
13 program?

14 A While GRLS provides professional learning  
15 and ongoing coaching and support. So whenever the  
16 directors or the coordinators are requested  
17 assistance with academic and/or behavioral support,  
18 I would go out, monitor what their needs were and do  
19 a needs assessment and then to go in and develop  
20 professional development to assist them with that.

21 Q Okay. So it's largely providing  
22 professional development to the Northwest Georgia  
23 GNETS program?

24 A Yes.

25 Q Okay. In providing professional

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1 development, did you develop any impressions about  
2 how well the Northwest GNETS program was operating?

3 A No.

4 Q When you provided professional  
5 development, was there any process by which after  
6 delivering professional development you went in for  
7 coaching or to assess how well that professional  
8 development was being implemented?

9 A Yes.

10 Q Okay. And how did that work?

11 A Well, again, it depends on what the  
12 professional development was about, but basically  
13 you provide the training, you go in and then you  
14 develop the training module, you assess the  
15 situation. You go back, you provide the results of  
16 it, and you go back in and you do coaching and  
17 support individualizing what the needs are based on  
18 the observations, and then you follow up with that.

19 But we also Train The Trainer model. So  
20 the expectation wasn't that I was the person that  
21 was going to be the keeper of the knowledge. So I  
22 trained other people to be mastery of whatever their  
23 needs were.

24 Q And what kinds of -- can you give me a few  
25 examples of the kinds of training professional

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1 development you provided to the Northwest Georgia  
2 GNETS program?

3 A I'm sure I -- you know, it's been a long  
4 time, but one of the things that I was constantly  
5 providing training on was PBIS, Positive Behavior  
6 Interventions and Supports; writing behavior  
7 intervention plans; knowing how to collect data on  
8 FPAs and BIPs as well.

9 Q When you say knowing how to collect data  
10 on FBAs and BIPs, what is an FBA?

11 A Functional behavior assessment.

12 Q How is that relevant in the GNETS context?

13 A Basically all students that have  
14 behavioral issues based on the research, you go in  
15 and you collect data based on the challenging  
16 behaviors. So you'll be able to set a goal and  
17 expectation and an intervention plan knowing what  
18 the functions of the behaviors are so you can set up  
19 an intervention that addresses the challenging  
20 behaviors, but you also have to know what the  
21 function of the behavior is because even though  
22 behavior may look the same, the reason why a child  
23 is acting a certain way may have a different reason  
24 for that.

25 So that's why you do the Functional

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1 Behavior Assessment first and then you develop the  
2 Behavior Intervention Plan.

3 Q And what is the Behavioral Intervention  
4 Plan?

5 A It depends on what the behavior is.

6 Q Broadly what is an --

7 A A Behavioral Intervention Plan is a plan  
8 that helps a teacher or the parapro work with the  
9 student to know exactly why the child is acting a  
10 certain way, and you develop an intervention based  
11 on the child's needs and desires to, you know, get  
12 rid of that challenging behavior, or at least lessen  
13 that behavior, so it becomes more, you know,  
14 normalized and as a general population.

15 Q Your resume says you also worked as a  
16 school improvement specialist within Metro RESA?

17 A Yes.

18 Q And when was that?

19 A It was a very short period of time, but it  
20 was around 2011 to 2012, for about a year. I guess.

21 Q And what did your role as a school  
22 improvement specialist entail?

23 A As a school improvement specialist, we are  
24 assigned the different schools across the metro  
25 Atlanta area that were under Metro RESA. So I was a

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1 special ed -- special education school improvement  
2 specialist, where schools that were on the list that  
3 needed extra support, I would go in and again I  
4 would do a needs assessment, observations, meet with  
5 the team to determine what their thoughts were on  
6 some of the challenging behaviors and help them  
7 develop and implement plans to address those  
8 behaviors.

9 Q And when you say you would go in and do a  
10 needs assessment, what kinds of needs were you  
11 assessing?

12 A All kind -- again, it depends on the  
13 school. Some of the schools would contact us  
14 because they had academic and behavioral challenges.  
15 That was of course my area of expertise, so in  
16 general those were the types of supports that I was  
17 providing on SDI, specially designed instruction,  
18 and more behavioral related things for populations  
19 of the schools who needed me most.

20 Q Okay. And you mentioned that you were a  
21 special education school improvement specialist. So  
22 I take it that there are also school improvement  
23 specialists that do not specifically address special  
24 education?

25 A Yes.

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1 Q And how are those two specialists  
2 different? Like what's the distinction?

3 A I think the schools have the same issues,  
4 but the person who can address those specific issues  
5 has a targeted area of specialty. So even though we  
6 all were school improvement specialists, I was  
7 called into the schools who really had needs based  
8 on their data and then going in doing to a data dig  
9 that their problems at the school were related to  
10 needs they have for special education.

11 Q Okay. Where did the funding to do that  
12 school improvement work come from?

13 A Georgia Department of Education.

14 Q Your resume says you also worked as a  
15 special education and English language learning  
16 product manager for Western Governors University?

17 A Yes.

18 Q And what was -- what were your roles and  
19 responsibilities in that position?

20 A They were revamping their Special  
21 Education Department, and they needed someone with  
22 my expertise to help develop the special ed  
23 curriculum for Western Governors University.

24 Q So this is a special ed curriculum for  
25 students who are studying to become special



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1 education teachers?

2 A Yes.

3 Q Going further back it says that you are  
4 also an education program specialist,  
5 emotional/behavioral disorders, at the Georgia  
6 Department of Education?

7 A Yes.

8 Q And what were your responsibilities in  
9 that role?

10 A In that role I oversaw the whole State of  
11 Georgia. They had program specialists at that point  
12 where, you know, school districts or individual  
13 schools would call and say, hey, we really see,  
14 looking at our data, that we have a personal need  
15 in -- you know, I keep going back to FBAs and BIPs,  
16 or behavioral issues, and that was my area of  
17 expertise.

18 They would look at their discipline data  
19 and they would say, hey, I really need your help in  
20 helping me to determine what we need to do, how to  
21 dig in deeper to make sure that we address these  
22 concerns that we have.

23 But where in GNETS I have different school  
24 districts, I have four; at the DOE any school  
25 district that needed my help would be able to call

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1 in and say, hey, we really need you to come in and  
2 assist us with these behavioral related issues.

3 Q So is it fair to say that that role was  
4 sort of you were providing technical assistance --

5 A Yes.

6 Q -- to the entire --

7 A State.

8 Q -- State at the request of school  
9 districts?

10 A Yes.

11 Q You mentioned when you were working at the  
12 GLRS that a lot of what you were doing was  
13 professional development?

14 A Yes.

15 Q Is that true of this position as well or  
16 --

17 A Yes.

18 Q While you were an education program  
19 specialist for emotional and behavioral disorders at  
20 the Georgia Department of Education, did you work  
21 with any GNETS programs in that role?

22 A Yes.

23 Q And what ways did you work with GNETS  
24 programs in that role?

25 A Again, the school districts -- and GRLS

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1 and GNETS are all part of the special ed umbrella.  
2 So anyone that would call to say, hey, we really  
3 need your help and your eyes to look at whatever the  
4 situation is, I would go in and basically do the  
5 same type of technical assistance. Kind of evaluate  
6 and assess and kind do interviews and all of that  
7 sort of thing to develop a plan of implementation of  
8 how to address that behavior-related issue.

9 Q How long you were in that role?

10 A Which role?

11 Q The education program specialist for  
12 emotional and behavioral disorders at GaDOE?

13 A I think about three years.

14 Q And then finally your resume says that you  
15 also previously taught students with EBD and autism  
16 in Atlanta Public Schools?

17 A Yes.

18 Q And how long did you do that?

19 A About eight years. Seven or eight years.

20 Q What schools in APS did you teach at?

21 A Walter White Elementary.

22 Q Walter White?

23 A Yes.

24 Q So the entire time that --

25 A The entire time I taught at Walter White

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1 Elementary but I also implemented -- helped the  
2 middle school and high school implement programs as  
3 well as a chair person.

4 Q When you say the middle school and high  
5 school, you're talking about the middle school and  
6 high school that Walter White fit into?

7 A Just the Atlanta Public School District,  
8 period.

9 Q All middle schools and high schools?

10 A Right. I worked as a chairman on one of  
11 the committees there to address behavior  
12 district-wide. I didn't work at the other schools,  
13 though, no.

14 Q So you were on an Atlanta Public Schools  
15 district-wide committee --

16 A Yes.

17 Q -- to address behavior issues at the  
18 middle school and high school level?

19 A Yes.

20 Q Are there particular initiatives you  
21 worked on when you were on that committee?

22 A Working with students that were  
23 transitioning from GNETS programs. They were called  
24 Psycho Ed programs then.

25 Q And you say you were working with students

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1 that were transitioning from GNETS programs. How  
2 were you working with students who were  
3 transitioning? What were you doing in particular?

4 A Helping to develop school-based programs  
5 for kids that the IEP team thought were ready.

6 Q So you were helping to develop programs  
7 that would help support students who had been in  
8 GNETS come back into the general education setting  
9 and be successful?

10 A Yes.

11 Q What kinds of supports did you propose or  
12 work on introducing in that role?

13 A It's very similar to the school-based  
14 GNETS programs we have right now. So to help them  
15 have academic behavior and therapeutic support  
16 services, but they also have like a home base where  
17 they can go and get more individualized supports  
18 than the typical classroom teacher could provide  
19 from a special ed teacher that had the expertise and  
20 the training.

21 Q So were you creating basically transition  
22 classrooms in particular middle schools and high  
23 schools to receive those GNETS students?

24 A Yes.

25 Q And were those classrooms staffed by GNETS

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1 staff or building level staff?

2 A I don't recall then how they were staffed,  
3 but I'm sure that they're very similar to the way  
4 they are now, but I don't recall.

5 Q Okay. What grade levels did you teach  
6 when you were at Walter White?

7 A K-3 -- no. K-5.

8 Q And was that like a self-contained special  
9 education classroom?

10 A Yes.

11 Q Does the North Metro GNETS program serve  
12 students from multiple school systems?

13 A Yes.

14 Q How many school systems does North Metro  
15 serve?

16 A I serve four, but Buford City schools has  
17 a collaborative agreement with Gwinnett County  
18 schools, so they are served within the Gwinnett  
19 program.

20 Q Okay. And what are the other school  
21 systems that North Metro GNETS serves?

22 A Atlanta Public Schools, Fulton County  
23 Schools, Gwinnett County Schools, and Buford City  
24 Schools.

25 Q Has a group of school systems that North

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1 Metro GNETS serves changed since 2015 at all?

2 A Can you clarify that question?

3 Q Sure. Sometimes, you know, a school  
4 system may not be served by a GNETS program or they  
5 may move to another regional GNETS program. So I'm  
6 just wondering if from 2015 to the present, has  
7 North Metro GNETS always served only the school  
8 systems that you just listed, APS, Gwinnett, Fulton,  
9 and Buford City?

10 A Yes.

11 Q Does North Metro GNETS program serve  
12 students across multiple sites?

13 A Yes.

14 Q And how many sites do you have within the  
15 North Metro GNETS program?

16 A Twenty-one.

17 Q Has the number of sites remained  
18 consistent, from 2015 to the present?

19 A Um, a couple of years ago -- Atlanta  
20 Public Schools used to be divided into North  
21 Atlanta, South Atlanta. Fulton County Schools used  
22 to be divided North Fulton, South Fulton. And over  
23 the course of the years the school district asked me  
24 if I could take over all of Atlanta Public Schools  
25 and all of Fulton County Schools.

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1                   So in that respect the division changed,  
2                   but the school districts did not.

3           Q       Okay. So just to clarify, when Atlanta  
4           Public Schools had South Atlanta, and Fulton County  
5           Schools had South Fulton County, were those portions  
6           of those school systems served by the South Metro  
7           GNETS program?

8           A       Yes.

9           Q       And now North Metro GNETS program serves  
10          all of Fulton County and all of Atlanta Public  
11          Schools?

12          A       Yes.

13          Q       Including those areas that were previously  
14          served by South Metro GNETS?

15          A       Yes.

16          Q       When did that change take place?

17          A       Hum. My guess, I think it was about three  
18          years for, for Fulton. I think it was in my third  
19          year, taking over South Fulton, and it's probably  
20          been between three to five years with Atlanta.

21          Q       So that change with South Fulton maybe  
22          occurred somewhere around 2019?

23          A       Yes.

24          Q       And Atlanta Public Schools change was  
25          prior to that?



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1 A Yes.

2 Q When you mentioned that you have 21 sites  
3 right now, has that number fluctuated between 2015  
4 and today?

5 A Yes.

6 Q What's the largest number of sites you've  
7 had in that time period?

8 A Right now is the largest, 21. And then  
9 when I took over the South Fulton and South  
10 Atlanta -- so South Atlanta had -- one, two, three  
11 -- they had five sites, in Atlanta, that used to be  
12 South Fulton. And then six sites that used to be in  
13 South Fulton that I now have.

14 So it was an addition of 11 different  
15 locations.

16 Q Okay. So there were five sites that used  
17 to be in South Atlanta, and six sites that used to  
18 be in South Fulton that are now part of North Metro  
19 GNETS?

20 A Yes.

21 Q How many sites were there in the North  
22 Metro GNETS program when you took over in 2012?

23 A Could you repeat that?

24 Q Sure. I'm just trying to get a sense for  
25 the change in terms of the number of sites --

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1 A Right.

2 Q -- where your serving students.

3 So you became director of the North Metro  
4 GNETS program in 2012?

5 A Uh-hum. (Affirmative.)

6 Q And I'm wondering if you recall how many  
7 sites there were in the North Metro program at the  
8 time you took over as director?

9 A Okay, let me count.

10 There are five in Gwinnett, one in  
11 Atlanta. That's six. And six in North Fulton.  
12 Twelve.

13 Q Okay. Does the North Metro GNETS program  
14 has what is known as a fiscal agent?

15 A Yes.

16 Q Who is North Metro GNETS' fiscal agent?

17 A Metro RESA.

18 Q So we're on the same page, what is the  
19 role of North Metro's, North Metro's fiscal agent?

20 A They oversee all of our funding that flows  
21 from the State and the federal level.

22 Q And when you say they oversee the funding,  
23 what does that mean?

24 A We have a CFO, chief financial officer,  
25 and a budgeting and an HR Department there that we

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1 collaborate and we work with.

2 So they help me maintain all of the  
3 funding and make sure that it's spent the way it's  
4 supposed to be spent, in the right areas.

5 Q Okay. And so I believe you mentioned that  
6 there's both state funding and federal funding?

7 A Yes.

8 Q And that's specifically for the North  
9 Metro GNETS program?

10 A Yes.

11 Q That funding flows to Metro RESA?

12 A Yes.

13 Q And so Metro RESA kind of holds those  
14 funds for use by the North Metro GNETS program?

15 A Yes.

16 Q What's the process by which you obtain  
17 access to that, those funds, to pay staff or to buy  
18 supplies, whatever it is you need? How does that  
19 work?

20 A Again, we have line items. We have items  
21 that are approved by the State based on those  
22 guidelines. So we draw down money based on the  
23 need.

24 So it's just like any other school  
25 district would do. There are approved federal and

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1 state funds. So our CFO, we work together to make  
2 sure that, you know, supplies, materials, computers,  
3 that sort of thing, are, you know, dispensed based  
4 on the needs of the program.

5 Q Do you have to submit something like a  
6 purchase order?

7 A Yes.

8 Q Or some sort of actual request to Metro  
9 RESA for those things?

10 A Yes.

11 Q And then Metro RESA approves it and pays  
12 it out?

13 A Yes.

14 Q Do you have regular meetings with Metro  
15 RESA regarding the North Metro GNETS program?

16 A Yes.

17 Q And how often are those meetings?

18 A They're anywhere between a month to two  
19 months. Every other month or so.

20 Q Okay. And with whom at Metro RESA do you  
21 meet?

22 A Typically with Dr. Leigh Ann Putman, my  
23 RESA executive director, and Vanessa Haigler. She's  
24 our CFO, and sometimes -- I'm sorry.

25 Vanessa Haigler, and sometimes with

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1 Deborah Tabron, our HR person.

2 Q You said Deborah Tabron is the HR person?

3 A Yes.

4 Q When you meet with these folks from Metro  
5 RESA, what is the purpose of those meetings?

6 A We're usually going over a budget and  
7 HR-related issues to just make sure that I keep them  
8 abreast of all of our needs and also the funding.

9 Q Do you meet with them to discuss anything  
10 on the programmatic side?

11 A I speak with Leigh Ann about it. If  
12 there's an issue that's going on, I will definitely  
13 keep her in the loop and we collaborate if it's  
14 anything I need her to help me intervene on.

15 Q Okay. Does North Metro GNETS have an  
16 Advisory Board?

17 A Yes. The special ed directors.

18 Q And when you say the special ed directors,  
19 the special ed directors for the districts that  
20 North Metro GNETS program serves?

21 A Yes.

22 Q And is that like -- are they constituted  
23 as an official Advisory Board?

24 A Yes.

25 Q How long has that Advisory Board been in

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1 place?

2 A It's a part of the State Board Rule, and  
3 it's always been set up that way. So our  
4 collaborative community meetings is when all the  
5 special ed directors, GNETS directors, everybody  
6 comes to the table once a month.

7 Q You said that the Advisory Board is a part  
8 of the State Board Rule. What is the State Board  
9 rule that you're referencing?

10 A GNETS.

11 Q The GNETS State Board Rule?

12 A Yes.

13 Q You mentioned collaborative community  
14 meetings, and I believe you said those happen once a  
15 me?

16 A Yes.

17 Q Who in particular participates in those  
18 collaborative committee meetings?

19 A GLRS sets the meetings but the special ed  
20 directors from all of the metro Atlanta areas that  
21 fall under our RESA come to those monthly meetings.

22 Q Do you also attend those monthly meetings?

23 A Yes.

24 Q Does anyone else from your North Metro  
25 GNETS staff attend those meetings?

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1 A No.

2 Q So the meetings are attended by the  
3 special ed directors for the school systems that  
4 North Metro serves, GLRS and you?

5 A Yes. And it's also all the special ed  
6 directors that fall under the RESA, which is more  
7 than just my four school districts.

8 So RESAs serve more school districts as a  
9 whole than each of the GNETS does, so we're all at  
10 the table.

11 Q These collaborative community meetings are  
12 different from Advisory Board meetings?

13 A No. We collaborate them. We do that --  
14 we consider them all the same.

15 Q Okay. So Advisory Board meetings also  
16 happen once a month?

17 A Yes.

18 Q How many people were on staff at the North  
19 Metro GNETS program in the 2021-22 school year?

20 A I can't answer.

21 Q Can you give me a ballpark?

22 A Um, a hundred.

23 Q Okay.

24 A That were actually on my payroll, because,  
25 again, we have staff that the districts actually

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1 fund.

2 Q Okay. And for the current 2022-23 school  
3 year, approximately how many staff are on your  
4 payroll for the North Metro GNETS program?

5 A Probably about 90.

6 Q Approximately how many additional staff  
7 are there that are provided by LEAs?

8 A The LEAs provide a lot of the teachers and  
9 the paras as well that they fund. So I would say  
10 probably another -- across the districts, probably  
11 around a hundred, 150.

12 Q Okay. Are there any contracted positions  
13 at North Metro GNETS that you have not considered,  
14 quote unquote, on staff in your numbers?

15 A Yes. I do have some contracted staff.

16 Q And how many contracted staff do you  
17 currently have?

18 A I use a company, Comprehensive Behavior  
19 Change, and they have their own staff, but it is one  
20 company.

21 And then I contract with Morehouse School  
22 of Medicine, the psychiatric program, as my child  
23 psychiatric support.

24 Q Between those two sources, how many  
25 contracted staff are there currently?



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1           A     Dr. Maddox is one school psychiatrist, but  
2     she has psychiatric interns that support our program  
3     that are a part of the Morehouse School of Medicine,  
4     but the contract is only with her. So I do have  
5     interns that are going through internship. So I  
6     don't know how you want to count that.

7           Q     Okay.

8           A     And then Comprehensive Behavior Change is  
9     owned by two people, two BCBAs, but I also have  
10    contracted this year with several of their RBTs. So  
11    it's probably between six and eight of them as well.

12          Q     Does North Metro GNETS currently have any  
13    vacancies?

14          A     Yes.

15          Q     How many vacancies do you have?

16          A     Um, if you want exact numbers, I can't  
17    give you an exact number but I can give you a  
18    guesstimate.

19                I think I am down two school  
20    psychologists, two social workers, I think two  
21    teachers, and four parapros, approximately.

22          Q     The two school psychologists that you're  
23    down, are those school psychologists who would have  
24    been at a particular site? Or how does that work?

25          A     My Gwinnett sites are my largest, and so I

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1 had a school psychologist that worked there  
2 full-time. So I am using a part-time person there.  
3 So that's one of the vacancies.

4 And then Fulton County Schools is about  
5 100 miles apart from north to south, and so I have  
6 one school psychologist that is currently doing the  
7 whole district. So I would have had the other  
8 school psychologist working in the north and the  
9 other in the south.

10 Q And then the two social worker vacancies,  
11 likewise are those site specific?

12 A Well, they're not -- they're district  
13 specific because our social workers and school  
14 psychologists, all except for one, serve the  
15 district. So multiple schools. So their itinerate.

16 So I am down one school social worker in  
17 North Fulton and one in Gwinnett.

18 Q How many social workers do you have  
19 serving -- do you have any social workers serving  
20 North Fulton right now?

21 A Yes.

22 Q How many do you have serving North Fulton?

23 A Two.

24 Q And how many do you have serving South  
25 Fulton?

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1 A One.

2 Q How many social workers do you have  
3 serving Gwinnett?

4 A Three.

5 Q And ordinarily you would have had four?

6 A Yes.

7 Q Where are the teacher vacancies?

8 A I have one in South Fulton. I have one in  
9 Gwinnett at the BRIDGE.

10 Q And how have you compensated for those  
11 vacancies?

12 A I have -- I used to have lead teachers. I  
13 have one or two of those left. So our lead teachers  
14 go into the classrooms to provide those supports,  
15 so. And substitutes as well.

16 Q So, for example, at the BRIDGE, do you  
17 have a lead teacher who's taking over the vacant  
18 teacher position?

19 A Yes. But it's every now and then. If I  
20 can get a substitute to go in, I hire a sub to go  
21 in. If not, the lead teacher leaves her duties and  
22 responsibilities and goes in and teaches those  
23 classes.

24 Q Today, at the BRIDGE, is there a  
25 substitute or is the lead teacher?

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1           A     It's -- I don't know today. I did not  
2     call to see.

3           Q     Does that change on a day-to-day basis, or  
4     do you have a long-term substitute for some period  
5     of time?

6           A     We have long-term subs that we try to get  
7     to come every day, but it just depends.

8           Q     So that's something that could change from  
9     day-to-day?

10          A     Yes.

11          Q     And the teacher vacancy in South Fulton,  
12     is that the same, that it changes from day-to-day  
13     whether it's a substitute --

14          A     I have a lead teacher that's serving in  
15     that classroom right now, indefinitely.

16          Q     How do you compensate for the four parapro  
17     vacancies?

18          A     We do the best we can. I have behavior  
19     specialists that are all BCBAs or RBTs. So we go in  
20     and support those teachers. Or we've sometimes  
21     considered having our paras float from one classroom  
22     to the next. The teachers remain the same but the  
23     parapros go into the classrooms where the most needs  
24     are.

25          Q     When you have vacancies in particular, I'm

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1 thinking particularly about teacher vacancies, do  
2 you ever combine classrooms?

3 A Depends on the behaviors and the cognitive  
4 level of the students.

5 Q Have you done that in the past?

6 A I have done it in the past for like two  
7 EBD classes but it's really challenging if you have  
8 a low incidence autism class and an EBD class in the  
9 same building to be combined. So it's a challenge.

10 Q Approximately how many students were  
11 served in the North Metro GNETS program in the  
12 2021-22 school year?

13 A I think it was about 320, approximately.

14 Q And approximately how many students are  
15 currently being served in the North Metro GNETS  
16 program in the 2022-23 school year?

17 A I think about 275, and it fluctuates  
18 daily. That's why it's hard to give an exact  
19 number.

20 Q Okay. It sounds like there has been a  
21 decrease from last year?

22 A Yes.

23 Q What do you attribute that to?

24 A When our kids are ready to transition back  
25 to the LRE, we transition them.

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1 Q Are there a number of students that have  
2 been served last year and this year in North Metro  
3 GNETS program relatively consistent with the numbers  
4 you've seen over the last five to seven years, or  
5 have they changed significantly?

6 A They've changed.

7 Q In what way have they changed?

8 A We serve fewer students but they have more  
9 significant issues.

10 Q And why do you think that is?

11 A I think because we're doing a better job  
12 of meeting our students' needs behaviorally and  
13 academically, so those kids transition. But the  
14 kids that are with us really have some severe  
15 behavioral and mental health issues.

16 So requires more staff than typically  
17 we're funded for.

18 Q And when you say it requires more staff  
19 than what you're typically funded for, what to you  
20 mean by that?

21 A Well, when you have to provide one-on-one  
22 support to a student, it really requires a lot more  
23 services.

24 Q So in your experience you found the  
25 funding to be insufficient to meet that higher level

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1 of need that you're seeing in your student  
2 population?

3 A In some situations, yes.

4 MS. GARDNER: I'm going to ask the court  
5 reporter to please mark this exhibit as 628.

6 (WHEREUPON, Plaintiff's Exhibit-628 was  
7 marked for identification.)

8 BY MS. GARDNER:

9 Q Dr. Holifield, you have been handed what's  
10 been marked as Plaintiff's Exhibit 628.

11 Do you recognize this document?

12 A Yes.

13 Q And what is this?

14 A Our North Metro GNETS brochure.

15 Q Who created this document?

16 A I did.

17 Q And what is the purpose of this brochure?

18 A To share an overview of our program with  
19 the parents.

20 Q And this is a document that the North  
21 Metro GNETS program provided in response to the  
22 United States subpoena for documents; is that  
23 correct?

24 A Yes.

25 Q Turning to Page 2 of this brochure, am I

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1 correct this gives an overview of what North Metro  
2 GNETS actually is?

3 A Yes.

4 Q And it identifies it, as we've discussed,  
5 as one of the 24 GNETS programs across the State of  
6 Georgia?

7 A Yes.

8 Q Am I correct it goes on to say that GNETS  
9 "programs provide comprehensive educational and  
10 therapeutic support services to students who might  
11 otherwise require residential or other more  
12 restrictive placements due to the severity of one or  
13 more of the characteristics of the disability  
14 category of emotional and behavioral disorders  
15 (EBD) "?

16 A Yes.

17 Q Is that accurate?

18 A Yes.

19 Q Does North Metro GNETS program collect any  
20 data regarding the extent to which its services have  
21 prevented or impacted student's needs for  
22 residential or other more restrictive placements?

23 A No.

24 Q Does North Metro GNETS program track when  
25 any of its students are placed in a residential



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1 facility?

2 A Yes and no. And the reason why I say yes  
3 and no, once a child goes to a residential facility,  
4 it's no longer a GNETS student. It still -- it goes  
5 back to the LEA. So we don't track that.

6 Q So then do you, do you have any records or  
7 way of knowing historically which of your GNET  
8 students have gone on to residential treatment?

9 A Not -- no, not really. That would be the  
10 LEA.

11 Q Okay. This mentions other more  
12 restrictive placements. What would be examples of  
13 other more restrictive placements apart from  
14 residential treatment facilities?

15 A A day treatment facility.

16 Q Anything else?

17 A That's all I can think of right now.

18 Q Do -- does North Metro GNETS program track  
19 which students go to day treatment facilities?

20 A Not really. Again, it's an LEA decision  
21 at an IEP meeting. So we know which students were  
22 referred and were accepted for a residential or day  
23 treatment, but we don't track them. They just  
24 become unenrolled students with GNETS and they go  
25 back onto the enrollment with the LEA.

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1 Q Okay. So there's no like record or report  
2 you could pull that would show that?

3 A No.

4 Q There's a section on Page 2 that says:  
5 "Example of Services Offered."

6 Do you see that?

7 A Yes.

8 Q I want to just talk about a few of these.  
9 The first one says: "Educational Services &  
10 Supports by Certified Teachers and Curriculum  
11 Specialists."

12 A Yes.

13 Q Do you see that?

14 A Uh-hum. (Affirmative.)

15 Q And what are the services and supports  
16 that would be included in this category?

17 A The traditional teaching behavior,  
18 therapeutic groups. Those types of things.

19 Q I believe you said you have a curriculum  
20 specialist on staff at North Metro?

21 A Yes.

22 Q How many do you have?

23 A Two.

24 Q And how are those two curriculum  
25 specialists deployed across the --

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1 A I have three. Excuse me.

2 Q Three?

3 A Uh-hum. (Affirmative.)

4 Q How are they deployed across the --

5 A I have one. Kelley Wright serves all of  
6 North Fulton. I have one that serves South Fulton.  
7 I have one that serves Atlanta and she's shared with  
8 Gwinnett. So she has two different school  
9 districts.

10 Q Okay. This section also includes a bullet  
11 that says "Social Skills Training."

12 Do you see that?

13 A Uh-hum. (Affirmative.)

14 Q What kind of social skills training does  
15 North Metro GNETS program offer?

16 A We, we -- our school social workers and  
17 our school psychologists, we use different curricula  
18 to meet their social skills, but they have small  
19 groups, individual groups, that sort of thing.

20 Aspire is one of the things that we  
21 utilize that we got from the State, but he also use  
22 WhyTry as our main social skills curriculum.

23 Q What is Aspire?

24 A Aspire is just a framework that you teach  
25 kids to self-advocate for themselves, in an

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1 appropriate way.

2 Q And Aspire is something that your social  
3 workers and school psychologists deploy?

4 A Also teachers.

5 Q Is there a training that occurs for staff  
6 to equip them to sort of implement the principals of  
7 Aspire?

8 A Yes. We do booster trainings every year  
9 for all of our new teachers.

10 Q And you said Aspire is something you got  
11 from the State?

12 A Yes.

13 Q And how did that transpire?

14 A It was an initiative from the State a few  
15 years ago where everyone across the State was  
16 offered to participate in this self-advocacy  
17 training program for students with disabilities.

18 Q You also mentioned WhyTry?

19 A Yes.

20 Q And is that a social skills curriculum?

21 A Yes. It's a social skills and a  
22 trauma-informed care program built all together.

23 Q And is that something that North Metro  
24 GNETS program is using across all of its sites?

25 A Yes.

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1 Q And who, who is responsible for delivering  
2 that curriculum?

3 A Mostly our social workers.

4 Q And how do they do that?

5 A They have individual and small group  
6 therapy sessions where we go through the curriculum  
7 and teach them expectations.

8 Q Do those individual and small group  
9 therapy sessions touch every single student in North  
10 Metro GNETS?

11 A Yes.

12 Q How frequently do the small group sessions  
13 occur?

14 A At least three times a month.

15 Q How frequently do the individual sessions  
16 occur?

17 A It depends on the individual student based  
18 on their needs.

19 Q Anything else that falls into the category  
20 of social skills training that we haven't talked  
21 about?

22 A I don't think so.

23 Q Moving down to the fourth bullet, it says:  
24 "Behavioral Interventions & Therapeutic Support  
25 Services."

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1 Do you see that?

2 A Yes.

3 Q What are the behavior interventions and  
4 therapeutic support services provided by your school  
5 psychologists?

6 A Again, we, we have -- we have their FBAs,  
7 their BIPs. They have the social skills training.  
8 But the individual behavioral interventions depends  
9 on what's written in the IEP for the student.

10 Q And so -- but your school psychologists  
11 play a role in implementing that?

12 A Yes.

13 Q And what about your social workers, how  
14 are they involved with providing behavior  
15 interventions and therapeutic support services?

16 A Well, as a GNETS program, we're all  
17 trained to meet the needs of our kids based on their  
18 IEPs. So everybody plays a different role, but it's  
19 all based on the behavioral goals of the individual  
20 student.

21 So, again, the school psychologist plays a  
22 particular role maybe with CBT, cognitive behavior  
23 therapy; where our social worker may provide a  
24 different role but it's all based on the individual  
25 needs of the students.

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1 Q I'm just wondering if there are like  
2 categories of things your social workers can  
3 provide. Perhaps maybe they can't provide some of  
4 your school psychologists can provide. So are there  
5 things categorically that the social workers tend to  
6 focus on or be responsible for?

7 A Not categorically. I mean typically it is  
8 just teaching them the appropriate skills from a  
9 clinical and therapeutic aspect of how to be  
10 successful out in the environment, in the classroom,  
11 but when they also go home.

12 Q What kind of licensure do your social  
13 workers who are currently on staff have?

14 A They're all social worker certified from  
15 the Georgia PSC, or licensed clinical social  
16 workers.

17 Q And I believe you mentioned before BCBAs?

18 A Yes.

19 Q And I believe -- do you have any BCBAs who  
20 are fully like on payroll at North Metro GNETS?

21 A Yes.

22 Q How many?

23 A Two.

24 Q And then I believe you also said that --

25 A RBTs.

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1 Q Well, that you're contracting with an  
2 organization for additional BCBAs?

3 A Yes.

4 Q So how many additional BCBAs come through  
5 that contracting company?

6 A Of course, there are three that are BCBAs  
7 and they also provide RBT support as well.

8 Q Okay. And do you separately have RBTs on  
9 staff at North Metro GNETS?

10 A Yes.

11 Q I know you are an RBT?

12 A Yes.

13 Q How many apart from yourself?

14 A Um, let me count.

15 There are two in Atlanta. There are --  
16 I'm trying to think, in North Fulton. I think  
17 there's two in North Fulton.

18 And then there's one in Gwinnett.

19 So five.

20 Q And that's five not including you?

21 A Yes.

22 Q In this section of Example of Services  
23 Offered, the Local Interagency Planning Team also  
24 appears. Do you see that?

25 A Yes.



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1 Q Is that also referred sometimes as the  
2 LIPT?

3 A Yes.

4 Q What services does the LIPT offer?

5 A Well, LIPT basically offers services that  
6 are more extensive to the families. So it is a  
7 referral process with parental consent, where we sit  
8 down and we look to see what a student's needs are  
9 and the family needs are and the different agencies,  
10 explain what services that they have available that  
11 could assist the family.

12 Q Are all students enrolled in North Metro  
13 GNETS program involved in the LIPT?

14 A No.

15 Q How does a student sort of get integrated  
16 into the LIPT for those more extensive services?

17 A A parent has to make a request, or we  
18 could make the referral to a parent suggesting that  
19 we think there are some other services they may  
20 benefit from.

21 Q And so just using last school year 2021-22  
22 as an example, about how many North Metro GNETS  
23 students would you say were a part of the LIPT?

24 A Probably less than 10 percent.

25 Q This brochure also notes that there are

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1 services offered through other interagency linkages.  
2 Do you see that?

3 A Yes.

4 Q What services come from other interagency  
5 linkages?

6 A Those are the people that actually sit at  
7 the LIPT table. So that's like the overall name,  
8 but then there are different agencies that are the  
9 linkages within that program.

10 So Hope House and some of the other big  
11 ones, Youth Villages -- not Youth Villages. What is  
12 the name?

13 There are several different agencies that  
14 again come to the table, hear the profile of the  
15 student and the family's needs, and then they  
16 connect together at those LIPT meetings, but they  
17 are all different agencies.

18 Q So the meetings involve multiple agencies  
19 where there is some sort of a presentation of  
20 profiles of various --

21 A Students.

22 Q -- students?

23 A Uh-hum. (Affirmative.)

24 Q And then there's kind of a discussion  
25 among the group as to what are the resources that

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1 could support the student?

2 A Yes.

3 Q Understood.

4 Are there other state agencies at the  
5 table for the LIPT?

6 A Not that I'm aware of, no.

7 Q Anyone from the Georgia Department of  
8 Education?

9 A No.

10 Q What about the Georgia Department of  
11 Community Health?

12 A Yes. Yes, they are there.

13 Q And what about the Georgia Department of  
14 Behavioral Health and Developmental Disabilities,  
15 DBHDD?

16 A Yes, they usually have a representative  
17 there. So I guess there are state agencies there.

18 Q Is there any representation from any  
19 Community Service Board?

20 A There could be, but I don't recall the  
21 last couple that I attended that there were.

22 Q Towards the bottom it says "District and  
23 Home School Collaboration."

24 Do you see that?

25 A Yes.

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1 Q What does this refer to?

2 A Well, we all sit at the table for students  
3 that are referred in for GNETS services and we also  
4 have progress meetings. So we constantly meet on  
5 the students because the students are still students  
6 of the district.

7 Q How often do you have progress meetings on  
8 students with the districts you serve?

9 A There's always an LEA from the district at  
10 all of our IEP meetings.

11 Q And is there a particular frequency with  
12 which IEP progress meetings occur?

13 A It depends on the student.

14 Q Is there any minimum sort of frequency?  
15 Do they have to occur at least every X period of  
16 time?

17 A Well, IEPs are done at least annually but  
18 they can be done more frequently.

19 MS. GARDNER: I don't know exactly how  
20 long we have been going, but would you like to  
21 take a short break?

22 A Sure.

23 THE VIDEOGRAPHER: The time is 10:32 a.m.,  
24 and we are off the record.

25 (A recess was taken.)

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1 THE VIDEOGRAPHER: The time is 10:45 a.m.,  
2 and we are on the record.

3 BY MS. GARDNER:

4 Q So I want to switch gears a little bit and  
5 talk a little bit about data and more so data  
6 collection and management and sort of like how you  
7 do that.

8 I'm wondering whether there is any sort of  
9 database or data portal where you at North Metro  
10 GNETS access information about the students that you  
11 serve?

12 A Well, all of our students, IEPs and their  
13 data, is placed in their IEP. So we are -- all the  
14 information is housed within -- like Infinite Campus  
15 is what Atlanta and Fulton use. And then Gwinnett  
16 uses Synergy.

17 Q And those are like student data management  
18 like databases, basically?

19 A It's basically where they keep all their  
20 documents for IEPs and data and that sort of thing.

21 Q And you said Fulton and APS uses Infinite  
22 Campus, and Gwinnett uses Synergy?

23 A Yes.

24 Q Do you have access to Fulton and APS'  
25 Infinite Campus database?

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1 A Yes.

2 Q And do you have access to Synergy?

3 A No.

4 Q Why is that?

5 A Because Gwinnett hasn't ever given me  
6 access.

7 Q Have you asked for access?

8 A Every year.

9 Q And every year they say no?

10 A Yep.

11 Q Do they -- has Gwinnett provided you with  
12 a reason why you cannot have access?

13 A I'm considered a contractor since I don't  
14 work for them.

15 Q Okay. You don't work for Fulton or APS  
16 either, though, correct?

17 A Correct.

18 Q Does your lack of access to Synergy  
19 present challenges in terms of your ability to see  
20 information about your students at North Metro?

21 A Yes.

22 Q What are those challenges?

23 A I can't monitor what I need to see. I  
24 physically have to go into the buildings to look in  
25 permanent folders to find information.

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1 Q So if you want to have historical  
2 information about students that you're serving at  
3 North Metro GNETS, you have to physically go to a  
4 school within Gwinnett County and look at like a  
5 hard copy file?

6 A Yes.

7 Q Are there hard copy files for all of the  
8 information that you would need to access?

9 A Sometimes.

10 Q Are there times where there's not a hard  
11 copy file containing the information that you need?

12 A Yes.

13 Q And what kinds of information generally  
14 like would you be looking for?

15 A Again, it depends on the situation with  
16 the student, but if I'm trying to, you know, get to  
17 understand like an historical perspective of what is  
18 occurring with a child to be able to intervene, I  
19 may or may not have access to that information in  
20 Gwinnett.

21 Q What has been Gwinnett's response when you  
22 explain this to them?

23 A That I'm a contractor and they will only  
24 give access to secure information to people who have  
25 an ID and work for Gwinnett County Public Schools

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1 directly.

2 Q Has there been any response to those  
3 instances where you're looking for information and  
4 information is not contained in paper records, so  
5 you can't get it at all?

6 A Could you rephrase that?

7 Q Yeah. I'm just wondering if you've had  
8 any conversations about the challenges in particular  
9 where there is no work-around. So I think you said  
10 earlier that one of the things you can do is you can  
11 go and look at hard copy files within Gwinnett but  
12 that sometimes there's information you're looking  
13 for that might not be contained in those hard copy  
14 files. Is that accurate?

15 A Yes.

16 Q So I'm just wondering if you've had any  
17 conversations with Gwinnett about those  
18 circumstances where information you're looking for  
19 would not be contained in hard copy files but where  
20 it's information that you need in order to  
21 effectively serve a student?

22 A Yes, I've had those conversations.

23 Q And has there been any response to those  
24 particular kinds of situations?

25 A We do the best we can with the information



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1 I have access to.

2 Q And what has been Gwinnett's response?

3 A I don't work for Gwinnett County Public  
4 Schools.

5 Q No, but presumably you have conversations  
6 with them about the challenges that are presented?

7 A Right.

8 Q Where you can't get the information from a  
9 hard copy record?

10 A Right. That's their response.

11 Q Oh, it's just you don't work for us?

12 A Yes. I mean they're not -- you know, it's  
13 not combative, but because I'm not employed with  
14 Gwinnett, their perspective is I'm a contractor. So  
15 even though I'm the director of the program in  
16 Gwinnett, I still don't have access to students'  
17 IEPs and databases.

18 Q Are you familiar with the GNETS dashboard?

19 A Yes.

20 Q And what is the GNETS dashboard?

21 A Are you referring to the DOE dashboard  
22 within the portal, where we submit our budget? Is  
23 that the dashboard you're referring to?

24 Q I'm actually not sure. I know it's the  
25 GNETS dashboard. So I guess are you telling me that

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1 there is a GNETS dashboard within some sort of  
2 portal that you have that connects you to the  
3 Georgia Department of Education?

4 A Well, there's a -- there's a GNETS -- and  
5 I guess that's why I'm trying to clarify what you  
6 mean, but there is a tab within the GNETS -- within  
7 the DOE portal where we have to submit our budget  
8 and our documents every year. So that's the  
9 dashboard I assume you're referring to.

10 Q Okay. So the Georgia Department of  
11 Education has a portal that you log into in order to  
12 submit your budget every year?

13 A Yes.

14 Q And are you saying there is a tab within  
15 that portal that is called -- like it's a GNETS tab?

16 A Yes.

17 Q Do you submit any other information to the  
18 Georgia DOE via that portal?

19 A Usually just the budget, and we have an  
20 email address that we translate -- transmit  
21 confidential information, but that's it.

22 Q Okay. When you say you have an email  
23 where you transmit confidential information, what  
24 kind of confidential information would you transmit  
25 by that email?

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1           A       I mean only if they ask me for  
2       information, like a student list or a class list.  
3       So nothing more than information like that.

4           Q       Okay. And do you get periodic requests  
5       for information from the Georgia Department of  
6       Education?

7           A       No.

8                   MS. GARDNER: I'd like to ask the court  
9       reporter to mark this document as Plaintiff's  
10      Exhibit 629.

11                   (WHEREUPON, Plaintiff's Exhibit-629 was  
12      marked for identification.)

13      BY MS. GARDNER:

14           Q       You've been handed what's been marked as  
15      Plaintiff's Exhibit 629. This is an email from you  
16      to Nakeba Rahming, dated April 9, 2016, with the  
17      subject "Re: GNETS Dashboard Updates."

18                   And the first page of this document is  
19      Bates-stamped GA00041282.

20                   Do you recognize this?

21           A       Yes.

22           Q       Am I correct that in your email to Ms.  
23      Rahming you write: "I'm excited about the GNETS  
24      Dashboard and I'm sure everyone else will be excited  
25      about it as well. I'll keep this to myself until

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1 you're ready for us to share this information with  
2 our fiscal agents."

3 Do you see that?

4 A Yes.

5 Q And then am I correct that you go on to  
6 say: "In response to your questions, my North Metro  
7 GNETS Central Office is located within Atlanta  
8 Public Schools and I'd like them to serve as my NM  
9 GNETS Dashboard location."

10 A Yes.

11 Q "However, I have the most students served  
12 within Gwinnett County Public Schools but Gwinnett  
13 County Schools will not give me access to IEP  
14 online, Infinite Campus, nor any other database that  
15 my other districts give me access to. Gwinnett  
16 considers me a contractor and I've asked for the  
17 past 4 years to have access to my students' data,  
18 IEPs, etc. and the answer has always been no."

19 A Yes.

20 Q And is this what we have just been  
21 discussing, the challenges that you've been having  
22 with Gwinnett county?

23 A Yes. And looking at this email, the  
24 dashboard is SLDS.

25 Q SLDS, okay. What does SLDS stand for?

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1           A     Student Longitudinal -- Longitudinal Data  
2     System.

3           Q     And what is the Student Longitudinal Data  
4     System?

5           A     Basically, it's a portal where you can go  
6     in and look at individual student data that -- like  
7     absences and that sort of thing, that the rest of  
8     the State uses. They created that dashboard for  
9     GNETS as well.

10          Q     Okay. And when you say "they created that  
11     dashboard for GNETS as well," who is "they"?

12          A     DOE. Georgia DOE.

13          Q     When you say "they created the dashboard  
14     for GNETS as well," was there a time GNETS did not  
15     have access to SLDS?

16          A     I think it was during the time when -- I  
17     can't be sure, but I think SLDS was new to the State  
18     of Georgia, and then they created access for GNETS,  
19     because we serve more than one school district. So  
20     we had to have one school district to serve for all  
21     of our other districts.

22          Q     So there was some maneuvering required --

23          A     Yes.

24          Q     -- because GNETS is unique in that it  
25     covers multiple school systems?

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1 A Yes.

2 Q And so the Georgia Department of Education  
3 took the lead on sort of figuring out how to get the  
4 GNETS programs access --

5 A Yes.

6 Q -- to the SLDS?

7 A Yes.

8 Q You note in this email that at the time  
9 you sent this, most of the students served at North  
10 Metro GNETS came from Gwinnett County schools?

11 A Yes.

12 Q Is that still true today?

13 A Yes.

14 Q You discuss something here called IEP  
15 online?

16 A Yes.

17 Q What is IEP online?

18 A It's an IEP system that Atlanta Public  
19 Schools uses. So even though they use Infinite  
20 Campus as their school information system, IEP  
21 online is where the IEPs are written and they're  
22 connected together.

23 Q Does Gwinnett County also use IEP online?

24 A They use Synergy.

25 Q So Synergy contains --

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1 A Yes.

2 Q -- IEPs?

3 And Synergy is the database that you were  
4 saying you don't have access to?

5 A Correct.

6 Q What does having access to IEP online  
7 allow you to do?

8 A It allows me to help meet the needs of my  
9 students, you know, because all of their goals and  
10 objectives are determined by an IEP team. And in  
11 order to monitor progress and see how they're doing,  
12 you know, you have to look at the IEP because it's  
13 written specifically for a specific student.

14 Q So for students who are coming from  
15 Gwinnett County, where you don't have access to  
16 Synergy, you're looking at a hard copy IEP?

17 A Yes.

18 Q Am I correct that your email to Ms.  
19 Rahming responds to prior emails that Ms. Rahming  
20 had sent that you received?

21 A Yes.

22 Q I want to turn to the earliest of those  
23 emails, which appears on the second page of this  
24 document.

25 Am I correct that Ms. Rahming wrote to all

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1 of GNETS directors on April 8th, 2016 to discuss the  
2 GNETS Dashboard?

3 A Yes.

4 Q And in that email, and this is in the  
5 second paragraph, Ms. Rahming says that "Directors  
6 will be provided with administrative access for the  
7 Georgia SLDS via a link in a district's Student  
8 Information System, Infinite Campus, Power School,  
9 and SchoolMax. An ID and password will be provided  
10 for each GNETS staff to access the 'GNETS' dashboard  
11 to disaggregate GNETS teachers and students from  
12 teachers and students in school districts."

13 Do you see that?

14 A Yes.

15 Q And you've already explained to me what  
16 SLDS is, correct?

17 A Yes.

18 Q What kind of information can be obtained  
19 from SLDS?

20 A Information about the student's  
21 background, their picture, the age, their grades,  
22 absences, behavior, that sort of thing.

23 Q Does SLDS include discipline records?

24 A I think it includes attendance but not  
25 discipline, if I recall.



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1 Q And when you say that there's information  
2 about a student's behavior in SLDS, where would that  
3 appear?

4 A It depends on whether or not the school  
5 district has connected the information. So, again,  
6 I'm trying to remember the last time I looked in  
7 SLDS, it's more attendance data than discipline  
8 data.

9 Q Okay. Is there also academic data in  
10 SLDS?

11 A Yes.

12 Q What kind of academic data appears?

13 A Their testing data. You know, if they  
14 have GAA, or, you know, if they've taken the  
15 curriculum assessments, it's all in there.

16 Q When you say if they have GAA, that's the  
17 Georgia Alternative Assessment?

18 A Yes.

19 Q Would it also indicate whether the student  
20 is a milestone student?

21 A Yes.

22 Q I take it at the time Ms. Rahming sent  
23 this email the GNETS directors did not have access  
24 to SLDS?

25 A Correct.

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1 Q And she was working to change that?

2 A Yes.

3 Q Does North Metro GNETS have access to SLDS  
4 data now?

5 A Yes.

6 Q Ms. Rahming goes on to say in this email,  
7 towards the bottom of the second paragraph, and it  
8 says "The GNETS Dashboard will."

9 Do you see that?

10 A Bottom of the second paragraph. If an  
11 LEA -- where?

12 Q It says "The GNETS Dashboard will," and  
13 there's a list of six things that it will do.

14 A Oh, yes. Okay.

15 Q Do you see that?

16 A Yes.

17 Q And the first thing it says the GNETS  
18 Dashboard will do is: "Eliminate the limited access  
19 that GNETS staff have to student data/records  
20 because they are from other districts."

21 Do you see that?

22 A Yes.

23 Q And that's similar to the challenge that  
24 you were discussing with not having access to  
25 student data and records from Gwinnett County

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1 because you're not from Gwinnett County?

2 A Yes.

3 Q And just so I'm clear, when this says that  
4 GNETS staff are from other districts, does that mean  
5 other districts than the one that might serve as a  
6 GNETS program's fiscal agent, or what does that  
7 mean?

8 A I think it means that GNETS is a program  
9 that serves multiple districts. And so in SLDS,  
10 under the one partner you can pull this type of data  
11 from that SLDS but it's still not IEP data.

12 So we had to have multiple accesses for  
13 all of our school districts to get any other data  
14 prior to SLDS.

15 Q Okay. The other thing this says the GNETS  
16 Dashboard will do, under No. 2: "Provide  
17 opportunities for GNETS staff to have access to  
18 depend education resources."

19 A Yes.

20 Q What did you understand this to mean?

21 A What I understand it to mean now is, is  
22 that professional development is listed as one of  
23 the tabs in there as well that we have access to.

24 Q Professional development is listed as a  
25 tab in the SLDS?

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1 A Yes.

2 Q Okay. Moving town to the No. 4, it says  
3 "The GNETS Dashboard will: Provide common and  
4 comparable data for students across GNETS programs,  
5 sites, classes, and grade levels."

6 Do you see that?

7 A Yes.

8 Q Did your lack of access to data and  
9 information for students coming from Gwinnett County  
10 prevent you from viewing common and comparable data  
11 for North Metro students across sites?

12 A I can see SLDS data but I cannot see IEP  
13 data, so.

14 Q But before having access to the SLDS, you  
15 would not have even been able to review SLDS data  
16 across all of your GNETS students?

17 A Correct.

18 Q I take it then what you're saying now is  
19 you can view SLDS data across all of your students  
20 but you still cannot view the same sort of extent of  
21 IEP data?

22 A Correct.

23 Q Because you don't have access to the IEP  
24 data for Gwinnett County?

25 A Correct.

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1 Q And then the last thing in No. 6 here that  
2 this says the GNETS Dashboard will do is: "Make  
3 historical 'longitudinal' and operational 'real  
4 time' data available for all programs."

5 What do you understand that to mean?

6 A Once a student has enrolled in a school  
7 district, since the creation of SLDS, it's housed  
8 there. So if a student receives services, whether  
9 those are general ed or special ed student, the  
10 historical data with testing or whatever is in that  
11 one location, that you can see old test scores up to  
12 current time.

13 Q Okay. So if you wanted to see where one  
14 of your GNETS students who is a sixth grader was  
15 when they were in third grade in terms of their  
16 scores, you could go to SLDS and see that?

17 A Yes.

18 Q But before access to SLDS, if you didn't  
19 have access to the database for the district where  
20 that student came from, then you would not be able  
21 to access that information?

22 A Correct.

23 Q Okay. Is there any sort of data  
24 management tool that North Metro GNETS program uses  
25 for each fiscal year to record and report out

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1 information to the Georgia Department of Education?

2 A Can you be more specific so I -- I'm not  
3 really sure what you mean.

4 Q Sure.

5 MS. GARDNER: I'm going to ask the court  
6 reporter to mark this document as Plaintiff's  
7 Exhibit 630.

8 (WHEREUPON, Plaintiff's Exhibit-630 was  
9 marked for identification.)

10 BY MS. GARDNER:

11 Q Dr. Holifield, have you been handed what  
12 has been marked as Plaintiff's Exhibit 630. This is  
13 an email from you to Nakeba Rahming, dated July  
14 22nd, 2016. The subject is "Re: FY 17 GNETS Data  
15 Management Tool."

16 A Yes.

17 Q And this contains one attachment, which is  
18 an Excel spreadsheet with the file name "FY 16 GNETS  
19 Annual Verification Report" --

20 A Yes.

21 Q -- "\_Data Management Tool"?

22 A Yes.

23 Q The Bates-stamp on this document is  
24 GA00041656.

25 Do you recognize this?

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1 A Yes.

2 Q I'd like to ask you to just take a look at  
3 this email, which references a data management tool,  
4 which is what I want to ask you about.

5 A Okay.

6 Q So I'm hoping this will help refresh your  
7 recollection.

8 The attachment to this document was  
9 produced as an Excel document, so I'm also going to  
10 publish electronically the Excel version of this.

11 A Okay.

12 Q Can you see this document?

13 A Yes.

14 Q You see that the top is captioned -- the  
15 attachment is captioned "GNETS Data Management  
16 Document"?

17 A Yes, I'm familiar with the document.

18 Q Okay. What is this data management tool?

19 A Basically, it's a spreadsheet that they've  
20 asked us to document all the students that receive  
21 services in our program, and it tells us how many  
22 segments they're with us and when they come into the  
23 program and when they leave.

24 Q And when you say "this is a spreadsheet  
25 that they've asked us to document all the students

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1 that receive services in our program," who is  
2 "they"?

3 A The DOE.

4 Q Okay. So you receive this spreadsheet  
5 from the Georgia Department of Education?

6 A Yes.

7 Q Do you receive a new spreadsheet like this  
8 every fiscal year?

9 A We update the same spreadsheet.

10 Q Okay. But every year you submit new data  
11 to the Georgia Department of Education in this  
12 format?

13 A We now -- before we had the GNETS tab in  
14 there, we submitted this spreadsheet. Now that we  
15 have the tab, we still collect the data but we enter  
16 just the numbers into the electronic platform.

17 Q Okay. So at some point before there was a  
18 GNETS tab in the Georgia Department of Education  
19 portal, you would submit this actual spreadsheet to  
20 the Georgia Department of Education?

21 A Yes.

22 Q And what you're saying is that now that  
23 you have a GNETS tab in the portal, you simply enter  
24 all of the data that would appear in the spreadsheet  
25 directly into the portal?



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1 A Yes.

2 Q But you're still transmitting effectively  
3 the same data?

4 A Yes.

5 Q I want to just go over some of the  
6 information that is included on the spreadsheet, or  
7 that you would now report through the portal.

8 The spreadsheet includes students' first  
9 and last names, correct?

10 A Uh-hum. Yes.

11 Q On the far left-hand side there is a  
12 column for System ID?

13 A Yes.

14 Q What does that mean?

15 A The school district the student is  
16 actually located in.

17 Q So that's the student's home school  
18 district?

19 A Yes.

20 Q And is this system name just the name of  
21 the student's home school district?

22 A It's a -- there's two -- they're basically  
23 the same thing. The PGM004 A and B is an actual  
24 report that can be pulled by the school district,  
25 but then that's the system name.

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1                   So it's an identifier for each of the  
2                   different schools within the district.

3           Q       So, for example, for Fulton County School  
4           District, which North Metro GNETS serves, there  
5           might be a number that identifies Fulton County  
6           School District and then the system name would be  
7           Fulton County?

8           A       Yes.

9           Q       And what is the -- there's a field on this  
10          form that says Entry Date.

11                   Do you see that?

12          A       It's the date that the student was -- the  
13          first day the child received GNETS services for that  
14          year.

15          Q       Okay. So not the first day that the  
16          student was ever enrolled in GNETS, but the first  
17          date that the student attended GNETS for that  
18          particular fiscal year?

19          A       Yes.

20          Q       And correct that you also report exit  
21          dates?

22          A       Yes.

23          Q       And that would apply if a student left  
24          GNETS some time before the end of the fiscal year?

25          A       Yes.

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1 Q What is Program Type code mean?

2 A I think Program Type is whether it's a  
3 school base or a center base, if I recall.

4 Q This particular spreadsheet has the No. 2  
5 populated already in the Program Type code. What  
6 does the 2 mean?

7 A I don't know. I have to look at the  
8 cheat-sheet. It's in the manual.

9 Q But there is one code that's for  
10 center-based and one code that's for school-based?

11 A Yes.

12 Q And for each student that would be served  
13 by North Metro GNETS you would report whether that  
14 student was in a center or was in a school-based  
15 location?

16 A Correct.

17 Q What about Program Type Auxiliary code,  
18 what does that mean?

19 A I would have to look -- my secretary  
20 actually fills this spreadsheet out, so.

21 But it's basically the same kind of  
22 information. Again, whether it's school-based or  
23 whether it's a center-based program and the number  
24 of segments is pretty much everything they're asking  
25 in the spreadsheet.

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1 Q Okay. You said there's a cheat-sheet for  
2 filling this out?

3 A Yes. In the old GNETS manual.

4 Q Okay. And where did you obtain that GNETS  
5 manual?

6 A They gave it to us years ago. In this  
7 particular case, 2015, 2016.

8 Q And "they" being the Georgia Department of  
9 Education?

10 A Yes.  
11 It's also listed the -- in the QBE page of  
12 the DOE. It's a question and answer page on their  
13 website.

14 Q Okay. This also includes information  
15 about the Number of Daily Segments, correct?

16 A Yes.

17 Q And what is that field asking for?

18 A How many periods of the day do they  
19 receive services in the GNETS classroom.

20 Q Okay. And what is the total number of  
21 segments in a school day?

22 A It depends on whether they're a blocked  
23 schedule or whether they are traditional six segment  
24 day.

25 Q So traditional schedule would have six

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1 segments?

2 A A traditional would have six.

3 Q And a block would have how many?

4 A Four.

5 Q This spreadsheet also asks for information  
6 about mental health services provided at school?

7 A Yes.

8 Q What kind of information would you provide  
9 in that field?

10 A If a student's parents -- for example, if  
11 they go to LIPT, the Local Interaction Planning  
12 Team, and an outside service provider was given  
13 permission to come to the schools to provide those  
14 services at school, that would go in that field.

15 Q And then this also includes a field that  
16 says Mental Health Services Outside of School?

17 A Yes.

18 Q What kind of information would you report  
19 in that field?

20 A The same kind of information but a family  
21 sometimes will receive services for the entire  
22 family rather than just the student.

23 Q Okay. The next field says Move to Less  
24 Restrictive Services.

25 A Yes.

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1 Q What does that mean?

2 A They follow the continuum. If an IEP team  
3 determines that the child exited a school-based  
4 program and went to maybe, say, an IRR class,  
5 interrelated class, or back to their general ed  
6 classroom, we would document it there.

7 Q And is this kind of like a -- like a  
8 checkbox, like they did or they didn't? Or is this  
9 more qualitative information that you would enter  
10 here?

11 A Qualitative information so we could make  
12 sure that the services we're providing, how --  
13 basically whether or not the kids are exiting GNETS  
14 and going back into their LRE.

15 Q So in a field like this would you explain  
16 like what the student is doing if it's one class  
17 period out, or if it's IRR, they return fully to  
18 their --

19 A No. That would be in the actual student's  
20 IEP.

21 Q Okay. So what would the entry here look  
22 like, do you know?

23 A Move to a lesser restrictive?

24 Q Uh-hum. (Affirmative.)

25 A For example, if a child was in a

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1 center-based program and then they moved into a  
2 school-based program, and from a school-based  
3 program back into an IRR classes. So it's kind of  
4 like the backwards model of most restrictive to  
5 least restrictive, or least restrictive to most  
6 restrictive, depending on how their behavior goes.

7 Q Okay. And then the last column here says  
8 Basis of GNETS Dismissal.

9 A Uh-hum. (Affirmative.)

10 Q What does that mean?

11 A Basically, did they meet their goals. Did  
12 they meet their goals and they were exited from the  
13 program based on the IEP, or whether or not they  
14 went to a more restrictive program, a residential or  
15 day treatment.

16 Q Okay.

17 A Or back to a general ed classroom. It  
18 goes both sides of the spectrum.

19 Q And the fields that appear on the  
20 spreadsheet are still the fields that you would  
21 enter through the Georgia Department of Education  
22 portal?

23 A Yes.

24 Q Do parents of North Metro GNETS students  
25 have to sign any sort of records release for their

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1 students to receive GNETS services?

2 A Are you saying do they sign a consent for  
3 placement? What are you asking?

4 Q A records release.

5 A Oh, yes.

6 Q And how does that work?

7 A We just follow whatever the school  
8 district requirements are.

9 So if some confidential records are  
10 requested by an agency, it goes through like the  
11 legal office typically, and the LEA provides the  
12 information based on whatever the request is.

13 So it kind of goes through their legal  
14 department to approve or deny.

15 Q For a student who is referred to --  
16 referred for consideration of GNETS services, and  
17 then a determination is made they should in fact  
18 receive GNETS services, does that student have to  
19 sign a records release to move from their --

20 A Yes. It's in the IEP meeting.

21 Q And what is the reason for the student  
22 having to sign that records release?

23 A So we can get the information on how to  
24 best serve the student.

25 Q And when you say get the information,



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1 you're getting that information from the student's  
2 home school system?

3 A Yes.

4 MS. GARDNER: I want to ask the court  
5 reporter to mark this document as Plaintiff's  
6 Exhibit 631.

7 (WHEREUPON, Plaintiff's Exhibit-631 was  
8 marked for identification.)

9 BY MS. GARDNER:

10 Q You've been handed what's been marked as  
11 Plaintiff's Exhibit 631. This is a document on  
12 Georgia Department of Education letterhead, I  
13 suppose, and the title at the top is "George Network  
14 for Educational and Therapeutic Support GNETS FY 22  
15 Grant Application."

16 Do you recognize this document?

17 A Yes.

18 Q Is this North Metro GNETS FY 22 Grant  
19 Application?

20 A Yes.

21 Q And is this a document that North Metro  
22 GNETS produced to the United States in response to a  
23 document subpoena?

24 A Yes.

25 Q I want to talk a little bit about the

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1 timing of this grant application.

2 First of all, who puts this grant  
3 application together for North Metro?

4 A You mean that completes it? I do.

5 Q Okay, you complete the application.

6 Are you the person who actually submits  
7 the application?

8 A I submit it to the portal, yes.

9 Q So you use the Georgia Department of  
10 Education portal that you were talking about earlier  
11 to submit this?

12 A Yes. So years ago they only had paper.  
13 Now we have portal. So I just copy and paste right  
14 into the portal this information.

15 Q At the top of this first page it says:  
16 "This FY 22 Grant Application and required  
17 attachments must be submitted by the fiscal agent  
18 through the Consolidated Application no later than  
19 June 30th, 2021. Budgets will be reviewed for  
20 approval after all required documentation is  
21 submitted through the Consolidated Application ."

22 Do you see that?

23 A Yes.

24 Q Who reviews the budgets for approval as  
25 it's stated here?

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1           A       So I -- my RESA director and my budget  
2       person review internally through North Metro and  
3       Metro RESA, and then it goes to the DOE, and Vickie  
4       Cleveland and Lakesha Stevenson are the DOE GNETS  
5       program manager and program specialists that review  
6       and approve the document.

7           Q       Okay. So just so I'm clear, Vickie  
8       Cleveland is the Georgia Department of Education  
9       GNETS program manager?

10          A       Yes.

11          Q       And Lakesha Stevenson is the GNETS program  
12       specialist at the Department of Education?

13          A       Yes.

14          Q       So you're saying that in terms of the  
15       review of budgets, once they're submitted through  
16       the consolidated application, that it's Ms.  
17       Cleveland and Ms. Stevenson who do that review?

18          A       Yes.

19          Q       So this says that this needs to be  
20       submitted no later than June 30, 2021, right?

21          A       Yes. But that's a typo.

22          Q       Okay. What's the typo?

23          A       Because the 2021 is an FY 22 grant  
24       application.

25                   Is that what you're asking?

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1 Q Yeah. So you're saying that this, this is  
2 a typo in terms of when it was supposed to be  
3 submitted?

4 A No. Actually, I'm thinking of the wrong  
5 year. Nevermind. It's correct.

6 We submit it every June prior to the  
7 following year. So the 2021 is correct. I'm sorry.

8 Q Okay. This is very confusing to me, too.  
9 So maybe you can help me understand.

10 A So the grant application is -- we have to  
11 submit it by June of the previous school year  
12 because our calendar years for schools go from July  
13 to June.

14 Q Okay.

15 A And then -- so I have to submit it at the  
16 end of the previous year for the July 1st, is the  
17 beginning of the new school year of 2022.

18 Q Okay. So when you submit this on June 30,  
19 2021, is this for your budget that applies for the  
20 fall of 2021 and the spring of 2022, or for your  
21 budget that applies for a full year leader?

22 A So this is my data from the ending of the  
23 previous school year, but the grant application is  
24 for funding for the upcoming school year.

25 Q Okay. So in this particular application

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1 the data that would be included would be from the  
2 2020-2021 school year?

3 A Yes.

4 Q And this would be reviewed for your budget  
5 that would apply in the 2021-2022 school year?

6 A Correct.

7 Q So after you submit this application,  
8 which it says has to be submitted no later than June  
9 30 of 2021, what is the relative time frame when you  
10 would then hear something about this application?

11 A It depends. I mean it varied from a  
12 couple of months to -- a couple months.

13 Q A couple months?

14 A Yes.

15 Q Would you hear prior to the start of the  
16 school year?

17 A Um, not typically, but our budgets  
18 actually extend through September 30th. So even  
19 though the fiscal year ends June 30th, the funding  
20 doesn't end until like September, so it carries into  
21 the next year.

22 Q Okay. And after you submit this, what  
23 typically would be the next step in terms of your  
24 notification of something about the outcome of this  
25 application?

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1           A       I would get a call from Vickie saying,  
2       hey, you know, can you explain this or can you  
3       explain that, I just want to clarify.

4                       So we kind of go through each section, if  
5       she had question, and then it would be approved.  
6       Then we would get -- my CFO would get an approval  
7       from grants accounting. I think that's the name of  
8       the letter approving the budget amount.

9           Q       How does the approval of the budget amount  
10       intersect with what I think is often referred to as  
11       like your preliminary and/or final allocation?

12          A       Can you rephrase that or clarify?

13          Q       Sure. I guess my question is, do you ever  
14       receive notification of just like your allocation  
15       for North Metro GNETS programs in terms of how much  
16       money you're receiving for the state grant and the  
17       federal grant?

18          A       Yes. So after the Governor approves the  
19       overall state budget, they send us a -- basically a  
20       notification of the different programs, what the  
21       award amount is for each GNETS program.

22          Q       Okay. And is that process separate from  
23       your submitting this grant application?

24          A       I think they're all tied together.

25          Q       Okay. Do know when you submit a grant

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1 application already what your preliminary allocation  
2 is?

3 A No. Not unless the Governor -- once the  
4 last day of the legislative session is over, we know  
5 what amount overall is approved for the GNETS grant,  
6 but we do not know what our individual allocations  
7 are until after that.

8 Q Okay. So how do you come up with and  
9 submit a budget if you don't actually know how much  
10 money you have to work with?

11 A Well, this is a grant application that  
12 doesn't include figures for money.

13 Q Let me turn to Page 2 of this grant  
14 application.

15 Am I correct that this chart that's  
16 included as part of your grant application shows the  
17 number of students transitioning to less or more  
18 restrictive settings for the upcoming school year FY  
19 22?

20 A Yes.

21 Q And for North Metro this chart shows that  
22 there were nine students returning to their home  
23 school or home district?

24 A Yes.

25 Q And that's out of 323 North Metro GNETS

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1 students total?

2 A Yes.

3 Q And then there were 146 students who were  
4 in a GNETS self-contained facility?

5 A Yes.

6 Q And 168 students who were in a  
7 school-based GNETS classroom or wing?

8 A Correct.

9 Q And just so I'm clear, these are figures  
10 for the upcoming school year? So when this was  
11 submitted, this would have been figures that you  
12 were anticipating for the 2021-22 school year?

13 A This was the -- this would have been the  
14 2021 to 2022 school year. So last school year.

15 So that was representative of what I  
16 served last year.

17 Q Okay, but this document was submitted by  
18 the end of June of 2021. So I'm just trying to  
19 figure out whether these numbers are sort of  
20 prospective in what you're anticipating or what they  
21 are actually recording what happened?

22 A So they are recording what happened for  
23 the school year I served the students, which is used  
24 I guess by the DOE to determine my allocations for  
25 the upcoming school year, because these are the



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1 numbers I ended with over the course of the school  
2 year.

3 Q So these are the numbers you ended with  
4 from the 2020-21 school year?

5 A Yes.

6 Q And this chart also shows how these  
7 categories break down by the school district over  
8 the North Metro --

9 A Yes.

10 Q Am I correct the pages that follow this  
11 grant application show a number of classrooms at  
12 each North Metro GNETS site along with the number of  
13 teachers and paraprofessionals at each site?

14 A Yes.

15 Q And for each site it breaks down the  
16 number of classrooms and the number of teachers and  
17 paraprofessionals to show how many serve at the  
18 elementary and middle school and high school levels?

19 A Yes.

20 Q The information specific to each site also  
21 explains the therapeutic staff available for that  
22 site?

23 A Yes.

24 Q So, for example, it would show whether a  
25 site has a psychologist, and if so whether that

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1 psychologist is full-time or part-time?

2 A Yes.

3 Q And it repeats that for other therapeutic  
4 staff as well?

5 A Yes.

6 Q Turning to Page 24, am I correct that this  
7 begins information about the North Metro GNETS  
8 staffing pattern?

9 A Yes.

10 Q And am I correct in understanding from  
11 this that the time you submitted this grant  
12 application North Metro GNETS had a total staff of  
13 212.5?

14 A Yes.

15 Q And that's, that's -- all 212.5 are not on  
16 your payroll, though, right?

17 A Correct.

18 Q So of the ones who would be on your  
19 payroll, that would be the 79.5?

20 A Yes.

21 Q And then there were 133 staff provided by  
22 LEA?

23 A Yes.

24 Q I want to walk through a couple of these  
25 positions.

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1 Beginning at the top, there's just one  
2 director at North Metro, and that's you, correct?

3 A Correct.

4 Q And your position is funded by the State  
5 grant?

6 A Yes.

7 Q You also have 20 classroom teachers that  
8 are funded by the State grant?

9 A Yes.

10 Q Do you know where those 20 classroom  
11 teachers are located?

12 A Yes.

13 Q Where are they located -- is there like a  
14 particular kind of -- are all those 20 teachers at  
15 centers or how does that work?

16 A They're all over. Literally, we have  
17 grant funded teachers in every school building and  
18 we also have LEA funded teachers in every school  
19 building.

20 Q So they're mixed together?

21 A Yes.

22 Q This chart shows that at the time you  
23 submitted this grant application you had four  
24 psychologists?

25 A Yes.

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1 Q And all four of those psychologists were  
2 also funded by the State grant?

3 A Yes.

4 Q What are the credentials of the  
5 psychologists that you have on staff?

6 A They all have a school psychologist  
7 degree, and they're either licensed school  
8 psychologists, or just school certified school  
9 psychologists.

10 Q So they all have certifications or  
11 licenses?

12 A Yes.

13 Q On the second page of the staffing pattern  
14 chart, it shows that you had eight social workers at  
15 the time of this grant application?

16 A Yes.

17 Q And all of those were also funded by the  
18 State grant?

19 A Yes.

20 Q And then there are five behavior  
21 specialists listed in your staffing pattern?

22 A At that time it was.

23 Q At that time?

24 A Uh-hum. (Affirmative.)

25 Q And those were all funded by the State

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1 grant?

2 A Yes.

3 Q You also had two curriculum instruction  
4 specialists at the time?

5 A Yes.

6 Q And those were funded by the State grant?

7 A Yes.

8 Q This says on the staffing pattern that you  
9 had 21 nurses. Do you see that?

10 A That is LEA funded, not grant funded.  
11 Yes.

12 Q It says -- there's an asterisk and it says  
13 "our nurses are shared nurses"?

14 A Yes.

15 Q And what does that mean?

16 A Basically, so in some of our schools --  
17 most of our schools the nurses are the school  
18 district's nurses and our students see those same  
19 nurses.

20 But in our center-based program, we have a  
21 nurse that's dedicated just to our one program.

22 Q Which, which location is that?

23 A Our Oglethorpe and Atlanta Public Schools.

24 Q And where does that -- where would that  
25 nurse show up on this chart? In the same category?

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1 A Yes.

2 Q Other Personnel, this lists curriculum and  
3 behavioral specialists, and it says two. That's  
4 separate from the curriculum specialists listed  
5 above?

6 A It's the same.

7 Q The same, okay.

8 And then moving down there's a list of  
9 Contracted Positions?

10 A Yes.

11 Q And Dr. Gail Mattox, this is the  
12 psychiatrist at the Morehouse School of Medicine  
13 that you were referencing earlier?

14 A Yes.

15 Q Then Comprehensive Behavior Change is the  
16 organization that you mentioned you contract with  
17 for BCBAs?

18 A Yes.

19 Q Here you had a contracted school  
20 psychologist. Do you still have a contracted school  
21 psychologist this current school year?

22 A Yes. She's actually one of my retired  
23 school psychologists and I haven't been able to find  
24 another one, so she's still contracting with me  
25 part-time.

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1 Q And those three contracted positions, it  
2 looks like, come out of federal funds?

3 A Yes.

4 Q I'm going to turn to Page 26.

5 I'm hoping that you can sort of give a  
6 brief explanation for how these Tiers I, II and III  
7 work functionally in your self-contained centers,  
8 and then in school-based classrooms within North  
9 Metro GNETS?

10 A Okay. Well, GNETS is already  
11 automatically a special ed program, so all of our  
12 kids are Tier III. So within the Tier III model we  
13 have a Tier I. So we divide up, so at least all of  
14 our programs get at minimum the services that are  
15 listed in Tier I, which means they have small group  
16 services. And depending on the severity, we also  
17 provide a small group by specialized certified  
18 clinical folks in the Tier II, and then even more  
19 supports at the Tier III level.

20 So at the bear minimum, our kids get at  
21 least three different therapeutic sessions a month;  
22 and in addition to that, after looking at their  
23 data, they get additional support services from the  
24 other experts.

25 Q And are those three sessions a month -- I

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1 know earlier we were talking about the social skills  
2 curriculum and your social workers and psychologists  
3 delivering those, and I think you said those  
4 happened three times a month before. Is that what  
5 you're talking about with respect to all of your  
6 North Metro GNETS students receiving that?

7 A Yes.

8 Q And then at Tier 2 and Tier III, there  
9 would be additional perhaps group or individual --

10 A Yes.

11 Q -- sessions?

12 A Yes.

13 Q Does that model look different at all in  
14 school-based classrooms?

15 A No.

16 Q Moving to Page 30, am I correct that this  
17 page identifies the trainings that North Metro GNETS  
18 staff have received?

19 A Yes.

20 Q Is what's listed here, particularly in the  
21 top box, Nos. 1 through 5, is this all still  
22 accurate?

23 A Yes.

24 Q Why does it say staff will be trained in  
25 Trauma Informed Care?



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1           A       Because as the research has come about  
2       about the importance of Trauma Informed Care, it's  
3       really important for us to really know even on a  
4       deeper level the root cause of what our kids'  
5       behaviors -- where it's manifesting from because,  
6       you know, overt behaviors look the same but the  
7       reason why the kid is exhibiting that behavior is  
8       because of a trauma in their life.

9                       So we need to make sure we understand  
10       those traumas so we don't re-traumatize a child and  
11       we can actively provide preventions and  
12       interventions that support the child.

13           Q       So I guess just to clarify, like this  
14       says, you know, all North Metro GNETS schools social  
15       workers are trained in Mindset, LSCI, and WhyTry,  
16       and then it says "and will be trained in Trauma  
17       Informed Care." So I'm just wondering were they --

18           A       They are trained now.

19           Q       They were not trained at the time you  
20       submitted this?

21           A       They were being trained. So we felt like  
22       we needed to go back through the trauma informed  
23       training. We did -- we now have an effective  
24       curriculum.

25                       So when the Trauma Informed Care

1 initiative initially started, there was a contracted  
2 person from the DOE that was going around the State  
3 training everyone, and we did not feel that it was  
4 effective enough, so I dug deeper and got a new  
5 curriculum and training materials for them.

6 So we were trained but not to proficiency,  
7 basically.

8 Q And when Trauma Informed Care initiative  
9 was initially launched, who was the contracted  
10 person for the DOE who started that training?

11 A I don't remember her name but I want to  
12 say she was a professor at Georgia State University.

13 Q And how long ago was the Trauma Informed  
14 Care initiative launched?

15 A It's probably been three or more years ago  
16 now. I mean COVID kind of makes you foggy of -- I  
17 want to say it was right before COVID.

18 Q Okay. And what is the new Trauma Informed  
19 Care curriculum that you've --

20 A I'm using 321 Insights, a Trauma Informed  
21 Care program curriculum.

22 Q And when did your staff receive training  
23 on that?

24 A We got initial training last year, and we  
25 tweaked it based on feedback. So we're in the

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1 second year of implementation this year.

2 Q And that was delivered to everyone on your  
3 staff?

4 A Yes. We have monthly meetings and  
5 trainings on that as part of our ongoing  
6 professional development.

7 Q Moving to Page 32, this page discusses  
8 observations and evaluations, correct?

9 A Yes.

10 Q And you started to talk a little bit about  
11 this earlier, and you briefly explained what TKES  
12 is, and TKES is used to evaluate North Metro GNETS  
13 teachers; is that right?

14 A Yes.

15 Q And that's for all North Metro GNETS  
16 teachers?

17 A Yes. It's also statewide.

18 Q Does -- do you or your leadership staff  
19 only evaluate the North Metro GNETS teachers who are  
20 on your payroll?

21 A No.

22 Q You evaluate --

23 A All of them.

24 Q And this here discusses that your site  
25 coordinators complete all TKES walk-throughs,

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1     formatives and summative evaluations. Right?

2           A     Correct.

3           Q     I believe you said earlier that you do  
4     conduct TKES evaluations for teachers who are  
5     struggling?

6           A     Yes.

7           Q     Do you do walk-throughs of those teachers  
8     as well?

9           A     Yes.

10           MS. GARDNER: I want to ask the court  
11     reporter to please mark this document as  
12     Plaintiff's Exhibit 632.

13           (WHEREUPON, Plaintiff's Exhibit-632 was  
14     marked for identification.)

15     BY MS. GARDNER:

16           Q     Dr. Holifield, you've been handed what has  
17     been marked Plaintiff's Exhibit 632?

18           A     Uh-hum. (Affirmative.)

19           Q     This is an email from you to Vickie  
20     Cleveland with a cc: to Deanie Fincher?

21           A     Yes.

22           Q     Dated March 29, 2019, with a subject "Re:  
23     GNETS Setup."

24           A     Uh-hum. (Affirmative.)

25           Q     This document is Bates-stamped GA00343281.

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1 Do you recognize this?

2 A Yes.

3 Q Who is Deanie Fincher?

4 A She is the DOE person that was assigned to  
5 us that was over the TKES and LKES system at the DOE  
6 level.

7 Q So she works specifically with TKES and  
8 LKES?

9 A Yes.

10 Q And am I correct that in this email thread  
11 Vickie Cleveland sends you an email on March 29,  
12 2019, saying: "Do your coordinators evaluate  
13 teachers?"

14 A Yes.

15 Q And then you respond and say: "Yes, I  
16 only evaluate teachers who are struggling."  
17 Correct?

18 A Yes.

19 Q When you say you only evaluate teachers  
20 who are struggling, how do you determine which  
21 teachers are struggling?

22 A By performance. I mean, you know,  
23 teachers that are having a hard time making progress  
24 with students academically and behaviorally, and  
25 after we go in and provide them with ongoing

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1 professional development and they're still  
2 struggling, you know, we go in and we do more  
3 ongoing side-by-side coaching and support for them.

4 Q So when you're determining which teachers  
5 are struggling, do you look at data from the  
6 students in that teacher's classroom?

7 A Yes.

8 Q Whether those students are making progress  
9 academically and behaviorally?

10 A Yes. That's not the only thing but that  
11 is inclusive of, yes.

12 Q Is there any sort of rubric or guidelines  
13 that you use to determine when the lack of progress  
14 is problematic and indicates a teacher is  
15 struggling?

16 A Yes. We do a classroom observation  
17 walk-through.

18 Q And is there a classroom observation tool  
19 that you use when you do that?

20 A Yes.

21 Q Where does that classroom observation tool  
22 come from?

23 A It's a modified version of a classroom  
24 walk-through observation the DOE and school  
25 improvement use.

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1 Q When you say modified, you took the DOE  
2 observation tool and made your own --

3 A Yes.

4 Q -- changes to it?

5 What things did you change about it?

6 A It's been so long now, I don't really  
7 recall, but basically it's divided up into each of  
8 the standards, and so we go in and we look at no  
9 less than two different areas off the evaluation  
10 tool at a time, but it basically is just kind of  
11 more of a snapshot. So over the course of the year  
12 we look at all eight standards for teachers but we  
13 are able to provide them with immediate feedback on  
14 that.

15 Q For teachers who are struggling, is there  
16 anything different about their TKES evaluation  
17 process other than you being the one who conducts  
18 the evaluation?

19 A We go in more frequently. So I don't  
20 always have to go in to provide that specific  
21 support to a teacher that's struggling, but I also  
22 try to go in to do that.

23 So we basically will pump up more  
24 observation and feedback, and then we do coaching  
25 and modeling and ongoing support. So our curriculum

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1 specialists help with that as well.

2 Q So for a teacher that's struggling, how  
3 often would you go in? Like on a -- in a given  
4 semester?

5 A Again, It depends on the severity of what  
6 the issue is. I mean sometimes it's a matter of a  
7 teacher not understanding how to do specially  
8 designed instruction. So at a minimum four times a  
9 year is what a traditional teacher gets that's not a  
10 veteran. They get two in the first semester, two in  
11 the second semester, but we add more observations  
12 and sessions with them. And we also model lessons.

13 Q When you say specially designed  
14 instruction, what do you mean by that?

15 A Basically differentiated instruction  
16 that's more individualized for the student.

17 Q Am I correct that if you look at the  
18 earlier parts of this email thread, so the emails  
19 that started the conversation, that this document  
20 relates to GNETS directors' ability to access the  
21 TKES and LKES tab from SLDS?

22 A Uh-hum. (Affirmative.)

23 Q Was there some sort of change being made  
24 for GNETS directors here? Was this part of getting  
25 GNETS directors up and running on SLDS?



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1           A     It's up and running. I mean sometimes it  
2     would -- it worked fine and sometimes we would have  
3     to go back the next year and tweak the system.

4           Q     So if you look on Page 2 of this document  
5     -- and this is in the email that you sent to Deanie  
6     Fincher on March 28, 2019 --

7           A     Uh-hum. (Affirmative.)

8           Q     -- you say, and this is kind of midway  
9     down on the first paragraph: "I too am concerned."

10                  Do you see that?

11           A     Yes.

12           Q     "I too am concerned that we/North Metro  
13     GNETS may continue to have some access problems  
14     since Gwinnett has their own evaluation system and  
15     APS is moving in that direction as well."

16                  What access problems were you concerned  
17     about here?

18           A     Well, I think, if I recall from this  
19     particular incident, our folks would have access  
20     from one year to the next, and then at the end of  
21     the year it was almost like some of the information  
22     would fall out of the system and I would have to go  
23     back through multiple times contacting the DOE with  
24     assistance to get them added back in.

25                  I have access to add them back in, but

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1 sometimes, based on me adding them in I could see  
2 them, but when my employees would log on to be able  
3 to access the system, they couldn't actually see it.

4 So it was like some kind of internal  
5 glitch that took some time to get worked out.

6 Q And when you say "like adding them in I  
7 could see them," are you talking about the teachers  
8 that you were evaluating? What are you talking  
9 about?

10 A I can add in everybody. So if I get a new  
11 employee or if somebody leaves, I am the -- I guess  
12 they call it the super user. So I enter in all of  
13 my staff's information, but in order for them to be  
14 evaluated within the system, they have to see it on  
15 their end, too.

16 Sometimes I could see where they've been  
17 entered and everything looks good, but on their end  
18 they still couldn't -- they were getting an error  
19 message. So it's kind of a back and forth  
20 conversation with Deanie Fincher and Hubert Bennett  
21 working with the school information system people at  
22 the LEA level. They would to the background work to  
23 get all that -- the systems talking to each other.

24 Q Okay. But in terms of the information  
25 that you were entering, this was being entered in

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1 SLDS?

2 A Infinite Campus -- yes, SLDS and then  
3 Infinite Campus, yes.

4 Q So you note here that you were concerned  
5 about access problems since Gwinnett has their own  
6 evaluation system and APS is moving in that  
7 direction as well. What did it mean for Gwinnett to  
8 have its own evaluation system?

9 A Well, you know, at one point I could not  
10 actually see the people in Gwinnett's access in SLDS  
11 because they use -- their system is called like a GT  
12 -- GTES or GLES. And, again, because they used  
13 their own system, it was very difficult to see them.  
14 But over time they got the two systems to talk. So  
15 I can see them now.

16 Q And just to be clear, even though Gwinnett  
17 had its own evaluation system, you were still  
18 evaluating North Metro GNETS teachers serving  
19 Gwinnett County students using TKES?

20 A Yes. And I only typically evaluate my  
21 coordinators, and my coordinators evaluate the  
22 teachers.

23 Q But your team was --

24 A Yes.

25 Q -- still evaluating those teachers using

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1 TKES?

2 A Yes. Well, let me correct that.

3 They were not using TKES. They were using  
4 the Gwinnett system, which looks almost exactly like  
5 TKES and LKES, but they call it something different.

6 So, in other words, the SLDS system and  
7 the TKES and LKES kind of start talking to the  
8 Gwinnett system. So they were using the Gwinnett  
9 platform. I guess it's like a single sign-on  
10 portal, but they were using the Gwinnett evaluation  
11 system that was being accessed through SLDS.

12 Q Okay. And they were entering the data  
13 there?

14 A Yes.

15 Q And in terms of what they were entering, I  
16 guess the guidelines or standards, was that being  
17 drawn from TKES?

18 A Yes.

19 Q The last school year, in the 2021-2022  
20 school year, how many North Metro GNETS teachers did  
21 you evaluate because they were struggling?

22 A None.

23 Q And what about this year?

24 A I have one that I'm about to evaluate  
25 that's struggling.

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1 Q I want to turn for a moment back to  
2 Plaintiff's Exhibit 631, which is the North Metro  
3 GNETS FY 22 Grant Application, and I have just a  
4 couple of other questions for you.

5 On Page 33 of that document, and this is  
6 connected to evaluations and walk-throughs.

7 At the top, the first dark bullet point  
8 says: "Observers will utilize the appropriate GNETS  
9 Observation Checklist as a portion of all TKES  
10 observations."

11 Do you see that?

12 A Yes.

13 Q What is the GNETS Observation Checklist?

14 A Basically, like I said before, we go  
15 through and there are the eight standards, and we  
16 make sure that we evaluate and look at at least two  
17 areas at a time in there, and we provide feedback on  
18 that.

19 Q So is this the observation tool that you  
20 were saying --

21 A Yes.

22 Q -- you tweaked?

23 A Uh-hum. (Affirmative.)

24 Q Okay. Then I'd like to have you turn to  
25 Page 40. This page discusses iReady.

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1 Do you see that?

2 A Yes.

3 Q What is iReady?

4 A IReady is a diagnostic tool that we  
5 progress monitor reading and math skills for our  
6 students who aren't on grade level.

7 Q Is that -- is iReady used at all of North  
8 Metro's GNETS sites?

9 A Yes, except for high school. It wasn't  
10 normed for high school.

11 Q And when you say it wasn't normed for high  
12 school, who made that decision?

13 A The, the developer. It's only a K-8  
14 program.

15 Q On this page this discusses Usage, Past  
16 Rate, and Growth. Do you see that?

17 A Yes.

18 Q And under Usage, it says, looking for  
19 students to accomplish greater than or equal to 45  
20 minutes per week per subject.

21 A Uh-hum. (Affirmative.)

22 Q Do you see that?

23 A Yes.

24 Q Where does that guideline for usage come  
25 from?

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1           A     That came from iReady, and the goals that  
2     were set across GNETS from the State when we began  
3     using iReady.

4           Q     When did you begin using iReady?

5           A     When the GNETS Strategic Plan was put  
6     together, which goes back to Nakeba. So maybe 2015,  
7     2016.

8                     That's a guess.

9           Q     And you said that these were goals that  
10    were set across all GNETS by the State --

11          A     Yes.

12          Q     -- at that time?

13                     So all GNETS programs use iReady?

14          A     Yes.

15          Q     This goal that appears also in usage of 80  
16    percent of students with greater than or equal to 45  
17    minutes per week per subject, was that also a goal  
18    set by the State when iReady was rolled out?

19          A     Yes.

20          Q     And then under Past Rate it says, "Look  
21    for 70% and above."

22          A     Yes.

23          Q     Is that also a goal that was set by the  
24    State when iReady was rolled out?

25          A     Yes.

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1 Q And then turn to Page 45.

2 At the bottom of this page there's a  
3 discussion of the types of services GNETS staff are  
4 providing to general education teachers and students  
5 within the GNETS catchment area.

6 Do you see that?

7 A Yes.

8 Q And it says: "North Metro GNETS is  
9 offering ongoing training and support to general  
10 education teachers in behavioral data collection,  
11 reporting, and analysis, Function Based  
12 Interventions and Supports, PBIS, and FBA/BIP  
13 interventions and supports."

14 A Yes.

15 Q How often is North Metro GNETS providing  
16 that sort of training and support to general  
17 education teachers?

18 A The most common time is when we have a  
19 child that's being referred for GNETS services. So  
20 we actually go in and we ask for all of the data  
21 that the general ed teacher has taken on the  
22 students. We look at that IEP, we look at their  
23 data, we look at the interventions that they put in  
24 the IEP that they're supposed to be implementing,  
25 and we go in and do an observation and provide



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1 feedback. So it's kind of that BST model again,  
2 behavioral skills training.

3 And we talk to them about whether or not  
4 they are effectively implementing the goals and  
5 objectives and the Behavior Intervention Plan.

6 Q So most commonly this type of training and  
7 support is in the feedback that you give when a  
8 student is referred for consideration for GNETS  
9 services?

10 A Yes. Sometimes building principals will  
11 ask us to come do trainings with their staff as  
12 well, but most frequently it's when there's a child  
13 that's being referred for services. Before we go  
14 any further, we want to make sure that they're  
15 actually doing what they're supposed to be doing.

16 Q And so last school year, the 2021-2022  
17 school year, how many times, if at all, did North  
18 Metro provide training to like an entire building  
19 staff? As you just said, sometimes principals ask  
20 for it.

21 A I don't know the answer to that. I would  
22 have to ask each of my coordinators since they're in  
23 the schools every day.

24 Q So when that training is done, that's not  
25 you personally, it's your site coordinators?

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1           A     Typically, it's the site coordinators. I  
2 do trainings to like the district behavior  
3 coordinators at -- you know, for the whole district.

4           Q     And how often do you personally do those  
5 kind of whole district trainings?

6           A     I do it typically at least once a year for  
7 each of my school districts, and sometimes more  
8 frequently.

9           Q     And last year how many times did you do  
10 them?

11          A     Approximately three to four. Approximate.

12          Q     At the very bottom of this section, the  
13 very last sentence says: "There appears to be a  
14 great training need statewide for more GNETS related  
15 PL."

16                   Do you see that?

17          A     Are you at the bottom paragraph? In the  
18 box or --

19          Q     The very last sentence at the very bottom  
20 of Page 45.

21          A     Okay.

22          Q     Do you see that sentence?

23          A     Yes.

24          Q     And PL, meaning professional learning?

25          A     Yes.

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1 Q What, what does this mean? What was the  
2 basis for this sentence?

3 A Again, basically, you know, we go in and  
4 we provide that BST training, behavior skills  
5 training. A lot of teachers think they're  
6 implementing with fidelity, and sometimes they are  
7 and sometimes they are not. So when we go in and  
8 provide that ongoing coaching and support and  
9 training, they're very appreciative of that.

10 Q And including this sentence, was the  
11 thrust of this that there is a great need in terms  
12 of people actually understanding what implementing  
13 with fidelity looks like? Or what were you trying  
14 to get at there?

15 A Just that there's an ongoing training  
16 need, period.

17 Q And you're saying that that training need  
18 is statewide?

19 A Yes.

20 Q And what was that based on?

21 A Just my recollection -- recollection of  
22 what I'm being asked to do to help support school  
23 systems and the other GNETS directors.

24 Q Just one other question on this document.  
25 I just want to make sure I'm correct in

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1 understanding.

2 The final pages of this application I  
3 believe contain charts with each of the GNETS staff  
4 members and their position, their certification,  
5 type and level.

6 A Uh-hum. (Affirmative.)

7 Q Areas of their certification and their  
8 years of experience.

9 A Yes.

10 Q Is that right?

11 MS. GARDNER: I'm happy to go off the  
12 record if you want to switch whatever it is you  
13 need to switch.

14 THE VIDEOGRAPHER: The time is 12:08 p.m.,  
15 and we are off the record.

16 (Discussion ensued off the record.)

17 THE VIDEOGRAPHER: The time is 12:09 p.m.  
18 and we are on the record.

19 MS. GARDNER: I'm going to ask the court  
20 reporter to please mark this document as  
21 Plaintiff's Exhibit 633.

22 (WHEREUPON, Plaintiff's Exhibit-633 was  
23 marked for identification.)

24 BY MS. GARDNER:

25 Q You have been handed what's been marked as

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1 Plaintiff's Exhibit 633. This is a document  
2 produced to the United States by North Metro GNETS  
3 program in response to a document subpoena. The  
4 file name as produced was "FY 22 GNETS Employment  
5 Status."

6 Do you recognize this document?

7 A Yes.

8 Q And is this a document that you prepared  
9 and collected for response to the United States  
10 subpoena?

11 A Yes.

12 Q Is this a list of North Metro GNETS staff?

13 A It was at the time, yes.

14 Q Okay. And this is the FY 22 list?

15 A Yes.

16 Q Correct that this shows each staff  
17 person's name and their position?

18 A Yes.

19 Q It also shows their certification and  
20 total years of experience?

21 A Yes.

22 Q And then their years of experience in  
23 GNETS in particular?

24 A Years of experience, period, in education.

25 Q Right. Is there also a GNETS years of

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1 experience over here?

2 A Yes.

3 Q Okay. And then it contains each staff  
4 person's gender and ethnicity as well?

5 A Yes.

6 Q And this says "Term Date." Does that mean  
7 termination date?

8 A Yes.

9 Q If there's a termination date listed here,  
10 does that termination mean involuntary termination,  
11 or does that -- could that be voluntary?

12 A It could be voluntary. Usually it's  
13 voluntary.

14 Q On this first page, I believe the last  
15 name is Goff?

16 A Yes.

17 Q And there's a termination date there. Was  
18 that a voluntary or involuntary termination?

19 A So termination in the terms of this means  
20 they quit. So they terminated employment with us.  
21 Not terminated as in being fired.

22 Q Okay. I'm curious, there are  
23 psychologists listed in your staffing list, some who  
24 have an entry for certification and others for whom  
25 the certification field is blank.

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1 A Uh-hum. (Affirmative.)

2 Q Is there a reason the certification field  
3 would be blank?

4 A No. All my school psychologists have  
5 certifications.

6 Q So just looking on this first page, the  
7 last name is Flamming? Crothers-Flamming, I guess.

8 A Yes.

9 Q Part-time psychologist.

10 A Uh-hum. (Affirmative.)

11 Q And there's nothing listed for  
12 certification. Is there a reason for that?

13 A We have a new CFO and I don't know how she  
14 pulled this report, but Judith is my retired one  
15 that has over 35 years of experience as a social --  
16 as a school psychologist. I'm not sure why that's  
17 blank.

18 Q Okay.

19 A The same thing with Arlene Barrow, she has  
20 about 20 years of certification with her Ph.D. I'm  
21 not sure why it's blank but she is definitely  
22 certified as a school psychologist.

23 Q Yeah. So Barrow has -- under  
24 certification it says SRS-7.

25 A Uh-hum. (Affirmative.)

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1 Q There's something there?

2 A Uh-hum. (Affirmative.)

3 Q I'm just curious about the other  
4 psychologists.

5 A Uh-hum. (Affirmative.)

6 Q The same thing on the second page, you  
7 have a social worker last name McNeely?

8 A She's no longer with us, yes.

9 Q That certification was blank. Was that  
10 person certified?

11 A Yes. I think she had a provisional  
12 certification.

13 Q What does that mean to have a provisional  
14 certification?

15 A Meaning when she started with us, she had  
16 graduated from a certified social work program and  
17 she was attempting to take the school social worker  
18 exam with the State of Georgia.

19 Q Okay. And when you -- you say she  
20 graduated from a certified school social work  
21 program. Is that master's level program, a bachelor  
22 --

23 A Yeah.

24 Q Master's level program?

25 A Yes.



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1 Q On the last page you have another social  
2 worker whose last name is Spivey, and it does not  
3 have a certification. Is that person also  
4 provisionally certified?

5 A She started with us with a provisional.  
6 She had just graduated I think from UGA and started  
7 and she took the exam after she started.

8 Q Is she certified now?

9 A Yes. But she's no longer with us. She's  
10 a master's level but -- she's certified in master's  
11 level but she's no longer with us.

12 Q Okay. What is the process at North Metro  
13 GNETS for hiring new personnel when there's a  
14 vacancy?

15 A We post the position on our teacher  
16 Georgia website and also on our Metro RESA website.  
17 The job notice and announcement and the  
18 expectations, the duties and responsibilities are  
19 posted as well.

20 Q And what happens after that?

21 A They start submitting applications for  
22 interest and an interview process is set up.

23 Q And how does the interview process work?

24 A Typically, I do what is called a fishbowl  
25 interview, where I have -- like if I have three

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1 applicants that are applying for a social worker's  
2 position I have a panel of experts and we  
3 round-robin questions. I've already reviewed their  
4 application and their certifications and all of  
5 that. And we score each of the applicant's  
6 applications and I call references. And if they  
7 pass the background check and the references are  
8 good, if the position is still available, they're  
9 offered a position.

10 Q And to be clear, when you do the fishbowl  
11 interview process, you're not interviewing all the  
12 applicants at the same time, right?

13 A Yes.

14 Q Oh, you are?

15 A It's a school improvement thing that's  
16 been going on for the last 10 years and it is  
17 amazing. They're like -- I tell them up front,  
18 you're fighting for the same position. Because a  
19 resume can be perfect, but when you actually meet  
20 somebody, they may not be what the resume says.  
21 It's wonderful.

22 Q Do -- is it your practice to interview  
23 everyone who applies for a position?

24 A No.

25 Q So there's screening?

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1           A     There's screening before and after the  
2 interview. But, yes.

3           Q     And do you do the screening before  
4 interviews yourself, or are there others on your  
5 team who participate?

6           A     I do it myself. And then my HR digs  
7 deeper after -- you know, when we get ready to  
8 recommend someone for hire. HR also.

9           Q     Do the other people who participate on  
10 your interview panels, is it the sort of same group  
11 of people or do you vary that?

12          A     I vary it.

13          Q     And what is that based on?

14          A     The position and the location.

15          Q     What happens after the interview is  
16 conducted?

17          A     Again, as a team, the interview of the  
18 experts, we score each of the questions the  
19 applicants answered and we talk about whether or not  
20 they actually answered the question with the  
21 specificity and the depth that we needed.

22                We talk about their background. We score  
23 all of that, and then we rank order the top first,  
24 second and third applicant, and then I start calling  
25 the references because it may turn out your first

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1 person you ranked as the highest order turns out  
2 that their background is not good or the references  
3 aren't good.

4 So I automatically lead with the three  
5 recommendations that I would consider.

6 Q And who makes the final decision about  
7 hiring?

8 A I do, unless the background check comes  
9 back not clear, and then HR and I both agree it's  
10 not a good fit.

11 Q So you make a final decision, and once you  
12 make a final decision, what happens after that?

13 A We -- I submit the package to HR and  
14 budget, and then they determine the salary  
15 calculations and all of that and the start date.

16 And when I say I do, it's really the whole  
17 team has scored the applicants and rank ordered  
18 them.

19 Q I'm going to talk a little bit more by  
20 some of the therapeutic services North Metro GNETS  
21 provides.

22 MS. GARDNER: I'm going to ask the court  
23 reporter to please mark this as Plaintiff's  
24 Exhibit 634.

25 (WHEREUPON, Plaintiff's Exhibit-634 was

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1 marked for identification.)

2 BY MS. GARDNER:

3 Q You've been handed what's been marked as  
4 Plaintiff's Exhibit 634. This is an email thread  
5 between you and Vickie Cleveland. The most recent  
6 email is from you to Vickie Cleveland on May 9,  
7 2018.

8 A Uh-hum. (Affirmative.)

9 Q With the subject "Re: Format for  
10 interventions."

11 A Uh-hum. (Affirmative.)

12 Q And there's one attachment that is a Word  
13 document with the file name "FY 18 GA0 Open Records  
14 Request\_NM GNETS Template."

15 The Bates-stamp on this document is  
16 GA00321183.

17 Do you recognize this?

18 A Yes.

19 Q Am I correct that you are providing the  
20 attachment to this email to Ms. Cleveland in  
21 response to a request from her for information she  
22 needed to respond to an open records request?

23 A Yes.

24 Q And what does the attachment to this email  
25 show?

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1           A       The interventions that we provide, the  
2       services and interventions, how it's funded, and who  
3       provides those services.

4           Q       And there are five interventions on this  
5       chart in-kind by LEAs; is that right?

6           A       Yes.

7           Q       And that's Read 180/Edmark Reading, Touch  
8       Math, Reading A To Z, Fountas & Pinnell Intervention  
9       Program, and Success Maker Reading & Math?

10          A       Yes.

11          Q       Are all of these academic interventions?

12          A       Yes.

13          Q       Are all of these used in all North Metro  
14       GNETS sites, or are there some used in some sites  
15       and some used in others?

16          A       They're district specific. And so some of  
17       these have been updated even since this report.

18          Q       Okay. We talked earlier about iReady,  
19       which appears on this list as well, correct?

20          A       Uh-hum. (Affirmative.)

21          Q       And that's also an academic intervention?

22          A       Yes.

23          Q       Funded by the GNETS state grant?

24          A       Yes.

25          Q       Is Edgenuity an academic intervention?

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1           A     It's an actual platform that has the  
2 milestone curriculum.

3           Q     And is that used in all North Metro GNETS  
4 sites?

5           A     Only in classrooms where the teachers are  
6 not professionally qualified all the way.

7           Q     Okay. So Edgenuity is an academic --

8           A     Standard space curriculum.

9           Q     And you use that when teachers don't have  
10 the professional qualifications to deliver in-person  
11 instruction?

12          A     Well, partially. So it's actually aligned  
13 with the State standards. So the teachers have this  
14 as a resource. They also align it with the district  
15 curriculum as well.

16          Q     When you have Edgenuity used in those  
17 classrooms where the teachers are not professionally  
18 qualified all the way, is Edgenuity the thing that  
19 provides the grade to the student?

20          A     It depends on how it's set up. So it's  
21 really - we use the blended learning model. So it's  
22 33, 33, 33.

23                 So basically 33 percent of the instruction  
24 is provided by using the resources on Edgenuity, 33  
25 percent of the instruction is provided by direct --

1 teaching from the teacher, and then 33 percent  
2 project-based learning.

3 Q And so where you have a teacher that's not  
4 professionally qualified all the way, is there  
5 something magical about the number 33 that allows  
6 that teacher to deliver instruction in a way that's  
7 broken down in that manner?

8 A Well, we just want to make sure that all  
9 the students are getting the individualized  
10 instruction that they need from the various  
11 resources that are available, that are already  
12 aligned with the milestones.

13 So there's this thought that GNETS kids  
14 are sitting on a computer all day, which is not  
15 true. So we do provide direct instruction using  
16 Edgenuity as a resource for academics.

17 Q What is KTEA-3?

18 A That is the Kaufman test of educational  
19 achievement, and it basically is an academic  
20 evaluation that is -- we administer to all of our  
21 kids once a year, reading, math, writing, and the  
22 subcategories.

23 Q That's funded by the GNETS state grant?

24 A Yes. Our school psychologists administer  
25 that.



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1 Q And what about, moving down, the  
2 Multi-tiered Systems of Support, both Academic and  
3 Behavioral?

4 A Yes.

5 Q What is that?

6 A Basically PBIS. There's an academic and a  
7 behavioral tier support services. So MTSS. And the  
8 tiers are interventional, are very similar.

9 Q That's funded by the GNETS state grant?

10 A Yes.

11 Q What is the BASC-3?

12 A The basic skills -- it's a, it's a  
13 behavioral intervention. I'm trying to remember the  
14 initials for it. But it's a behavior normed test  
15 that we administer to our students that will tease  
16 out, based on the responses from the teachers, from  
17 the parents, from the service providers, the areas  
18 where our kids are either clinically significant, at  
19 risk, or, you know, on par with where they should be  
20 for their same age and grade level.

21 Q And do you use that to assess where  
22 students are behaviorally?

23 A Yes.

24 Q That's funded by the GNETS state grant?

25 A Yes.

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1 Q This also lists the Strength &  
2 Difficulties Questionnaire, or SDQ?

3 A Yes.

4 Q What is the SDQ?

5 A That's a screening tool we use as part of  
6 the GNETS Strategic Plan, that all GNETS statewide  
7 were asked to use as a part of the new strategic  
8 plan. So we can get a quick screener on how the  
9 kids are performing.

10 Q And who asked all the GNETS programs to  
11 use SDQ?

12 A The DOE.

13 Q The SDQ is funded by the GNETS state  
14 grant?

15 A Yes, it is.

16 Q This also says Group & Individual  
17 Therapeutic Support Services and Counseling?

18 A Yes.

19 Q That's funded by the GNETS state grant?

20 A Yes.

21 Q And is that because all of the positions  
22 for the providers who deliver that intervention are  
23 funded through the State grant?

24 A Yes.

25 Q There's several other interventions on

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1 this list, and we don't necessarily need to go  
2 through every single one of them, but I want to make  
3 sure I understand which of the interventions on this  
4 list are therapeutic interventions.

5 A Uh-hum. (Affirmative.)

6 Q So if you could just sort of look down the  
7 list and tell me the ones that are therapeutic, that  
8 would be helpful.

9 A Okay. So I'll start with the Multi-tiered  
10 Systems of Supports. Because it has academic and  
11 behavioral interventions, that includes therapeutic  
12 interventions.

13 The BASC-3, the results that come from  
14 that, that shows us where the areas are clinically  
15 and at risk of significance. Then we take that  
16 information and we provide therapeutic interventions  
17 based on the results of that.

18 The Group & Individual Therapeutic  
19 Supports, again we get that tiered information.  
20 That's part of the therapeutic supports.

21 The WhyTry, is a part of the therapeutic  
22 curriculum.

23 The ABA is a therapeutic piece that we  
24 provide.

25 The Mindset verbal de-escalation piece is

1 therapeutic, where we talk our kids through  
2 understanding what, what is going on with their  
3 behaviors.

4 The LIPT is an outside service provider  
5 that we talked about earlier. They come in and they  
6 provide therapeutic support services inside and  
7 outside of the school with us.

8 Morehouse School of Medicine, our child  
9 psychiatrists provides those psychological and  
10 therapeutic support services.

11 And so same thing with LSCI.

12 On the next page, the last three on there,  
13 Trauma Informed Care, FBA and BIP, and Check-In and  
14 Check-Out. And I already mentioned PBIS, which is  
15 really a part of the Token Economy. All of those  
16 have a therapeutic component.

17 Q What is Token Economy?

18 A Basically, it's part of the PBIS system  
19 where our kids, after they exhibit appropriate  
20 behaviors, they can earn extra points to have  
21 special privileges.

22 Q You talked a little bit earlier about your  
23 social workers and their involvement in group  
24 individual therapy, and I believe you said that in  
25 this sort of Tier I, Tier 2, Tier III structure that

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1 all North Metro GNETS students receive some sort of  
2 group therapy at least three times a month?

3 A Yes.

4 Q Those three times a month sessions, how  
5 long do those sessions typically last?

6 A It depends, because we -- of course,  
7 academics is what they're in school for. So it  
8 depends on how their scheduled.

9 So the length of time for a high school  
10 student is going to be much different than for an  
11 elementary student because they are required by law  
12 to go have their academics piece. So it just kind  
13 of depends on how long they are.

14 They may be 15 minutes, they may be 30  
15 minute sessions. But it does vary.

16 Q Is that the range, they would be somewhere  
17 between 15 and 30 minutes?

18 A Typically. Sometimes longer depending on  
19 the needs of the student.

20 But the Tier III students get a whole lot  
21 more, but we do have to schedule it so they get  
22 academics first.

23 Q So for students who are on Tier 2 or Tier  
24 III and are getting other sorts of therapy, is there  
25 any sort of guideline for how long those sessions on

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1 any given occasion would last? Like what's the  
2 shortest amount of time and what's the longest  
3 amount of time?

4 A No. Again, because we have to schedule it  
5 based on what is required by the State for academics  
6 first. So sometimes those sessions are lunch  
7 bunches, where we will take the time during lunch.  
8 We'll have lunch and we'll have a session during  
9 lunch. So lunches could be anywhere between 30  
10 minutes to 40 minutes.

11 Sometimes they are on their -- their  
12 homeroom day. So it just depends on how the  
13 student's schedule is.

14 Q And then what about individual therapy  
15 sessions, is there any sort of rule of thumb for --  
16 what the range of time those would last on any given  
17 occasion?

18 A No. Again, it depends on the child's  
19 schedule or the crisis that a child might be  
20 experiencing at the time.

21 Q For the current school year, 2022-2023, do  
22 you have a sense of how many of the students at  
23 North Metro GNETS are in that Tier 2 level that  
24 would be more than just the three times per month?

25 A The majority.

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1 Q And what about how many are in Tier III?

2 A Again, the majority.

3 Q So does that mean the majority of students  
4 at North Metro GNETS are getting sort of individual  
5 therapy above and beyond that three times per month  
6 --

7 A Yes.

8 Q -- sort of baseline?

9 A Yes.

10 MS. GARDNER: I'm going to ask the court  
11 reporter to please mark this as Plaintiff's  
12 Exhibit 635.

13 (WHEREUPON, Plaintiff's Exhibit-635 was  
14 marked for identification.)

15 BY MS. GARDNER:

16 Q You've been handed what's been marked as  
17 Plaintiff's Exhibit 635. This is an email thread  
18 between you and Nakeba Rahming from October 2016.

19 The first page of this document is  
20 Bates-stamped GA00065489?

21 A Uh-hum. (Affirmative.)

22 Q Do you recognize this?

23 A Yes.

24 Q Beginning with the earliest in time email,  
25 which appears at the bottom, am I correct that you

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1   emailed Ms. Rahming on October 6, 2016, and you  
2   said: My Fulton County Social Workers are attending  
3   a 'WhyTry' social emotional learning workshop and  
4   they are raving about this curriculum. Are you  
5   still considering purchasing a SEL curriculum for  
6   us? If so, have you looked into this one? Please  
7   let me know your thoughts. Thanks."

8                   Do you see that?

9           A     Yes.

10          Q     First of all, what is, what is an SEL  
11   curriculum?

12          A     Social/emotional learning.

13          Q     And Ms. Rahming responds to you the next  
14   day, and she says: "I am familiar with Why Try. I  
15   will not be purchasing a curriculum. I provided the  
16   directors with an approved list of curriculums to  
17   purchase. It is on our approved list."

18                   Correct?

19          A     Yes.

20          Q     You then reply to Ms. Rahming and ask:  
21   "Is the approved list in the GNETS Directors online  
22   notebook?"

23          A     Yes.

24          Q     What was the GNETS directors online  
25   notebook?



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1           A     At one point they had created like a share  
2     drive to share GNETS resources in one location with  
3     all GNETS directors.

4           Q     Okay. When you say "they" --

5           A     The DOE.

6           Q     Okay.

7           A     Sorry.

8           Q     Just make sure the record is clear.

9                     Did you receive a response to this  
10    inquiry?

11          A     She said it was on the approved list, so I  
12    purchased that curriculum.

13          Q     And was that curriculum purchased for  
14    students in all North Metro GNETS sites?

15          A     Yes.

16          Q     And you are still using WhyTry today at  
17    North Metro, correct?

18          A     Yes.

19                     MS. GARDNER: I'll ask the court reporter  
20    to please mark this document as Plaintiff's  
21    Exhibit 636.

22                     (WHEREUPON, Plaintiff's Exhibit-636 was  
23    marked for identification.)

24    BY MS. GARDNER:

25          Q     You've been handed what's been marked as

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1 Plaintiff's Exhibit 636. This is an email from you  
2 to Nakeba Rahming dated August 2nd, 2017, with the  
3 subject "GNETS RBT MOU."

4 A Uh-hum.

5 Q And one attachment that is a Word document  
6 with the file name "GNETS RBT MOU."

7 The document is Bates-stamped GA00791440.

8 Do you recognize this?

9 A Yes.

10 Q In this email to Ms. Rahming, am I correct  
11 that you write attached is a copy of the GNETS RBT  
12 MOU I drafted. Please let me know what you think."

13 A Yes.

14 Q What prompted you to send this draft MOU  
15 to Ms. Rahming?

16 A Because they were talking about getting us  
17 some more specialized training to be able to meet  
18 the needs of our students through TeachTown. And so  
19 in order to get our teachers or our interested  
20 parties and folks that are providing direct services  
21 to our students RBT trained, I wanted to see if this  
22 was permissible to share this information in this  
23 format.

24 Q Okay. And when you said "they were  
25 talking about getting us some more specialized

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1 training to be able to meet the needs of students,"  
2 is the "they" who were getting new training with  
3 Georgia Department of Education?

4 A Yes.

5 Q When you say "getting us some more  
6 specialized training," was that all GNETS directors  
7 or just North Metro?

8 A It was the whole state of GNETS, yes.

9 Q Okay. Got it.

10 Am I correct that the MOU that's attached  
11 basically requires the GNETS RBT applicant to  
12 complete RBT course work from an approved agency?

13 A Yes.

14 Q It also requires the RBT applicant to  
15 complete all duties and responsibilities of the  
16 GNETS Strategic Plan?

17 A Yes.

18 Q And the RBT applicant does that in  
19 exchange for the Georgia DOE paying for the RBT  
20 coursework, Competency Assessment and Exam?

21 A Yes.

22 Q And this MOU also says the Georgia DOE  
23 would pay for the competency assessment renewal and  
24 RBT supervision if the GNETS RBT agreed to reside as  
25 a GNETS certified RBT with their fiscal agent for a

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1 minimum of three years after they earn their initial  
2 RBT certification?

3 A Yes.

4 Q And that was pending funding?

5 A Yes.

6 Q What is a GNETS certified RBT?

7 A Basically, all of my folks that are  
8 providing direct services to students -- not all of  
9 them because I didn't have the money to do that --  
10 if they were interested in getting the extra  
11 credential to be behavioral experts under the BACB  
12 Board, I paid for them to get trained to be able to  
13 better meet the needs of our students.

14 So it's not something separate; it's an  
15 RBT.

16 Q Okay.

17 A Yeah.

18 Q So you did have some staff who became RBTs  
19 under this --

20 A Yes.

21 Q -- sort of process?

22 A Yes.

23 Q And how many did you have?

24 A At that time I trained all of my lead  
25 teachers because they were itinerant.

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1 I did have one or two coordinators who  
2 also got the RBT training. So less than 10, maybe  
3 about six at the time.

4 Q And did the Georgia Department of  
5 Education pay for some or all of those to get RBT  
6 status?

7 A Um, no. They paid for the TeachTown  
8 curriculum for them to train us. They were the  
9 certified agency, but I reimbursed my staff for  
10 taking the exam. I don't think we ever got the  
11 \$45.00 for the exam. So I don't recall that we got  
12 that information. They did pay for the actual  
13 coursework for the RBT training.

14 Q Okay. And that coursework came through  
15 TeachTown?

16 A Yes.

17 MS. GARDNER: I would like to please have  
18 the court reporter mark this document as  
19 Plaintiff's Exhibit 637.

20 (WHEREUPON, Plaintiff's Exhibit-637 was  
21 marked for identification.)

22 BY MS. GARDNER:

23 Q You've been handed what's been marked as  
24 Plaintiff's Exhibit 637. This is an email from  
25 Nakeba Rahming to you, dated September 18, 2017,

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1 with the subject line: "RBT Notice."

2 And one attachment that is a Word document  
3 with a file name "Introduction to RBT for GNETS."

4 The Bates-stamp on this document is  
5 GA00793645.

6 Do you recognize this?

7 A Yes.

8 Q And I take it from the last communication  
9 that we looked at that you and Ms. Rahming had been  
10 having conversations about RBT for GNETS?

11 A Yes.

12 Q I want to take a look -- well, first of  
13 all, Ms. Rahming writes to you in this email:  
14 "Please look and this let me know was think."

15 I think that's a typo?

16 A Yes.

17 Q But she was asking you to take a look at  
18 the attachment?

19 A Uh-hum.

20 Q So just turning to the attachment, this is  
21 a communication directed to the GNETS directors,  
22 correct?

23 A Yes.

24 Q And at the beginning it says: "This  
25 notice is to provide you with expectations for GNETS

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1 Registered Behavior Technicians (RBT) trainings and  
2 certification. You should have selected two staff  
3 members to complete the upcoming RBT trainings."

4 Do you see that?

5 A Yes.

6 Q And I take it from our conversation before  
7 that the trainings that are referenced here did  
8 actually occur?

9 A Yes.

10 Q And it sound like you selected the two  
11 staff members and more to participate?

12 A Yes.

13 Q The attached notice goes on to say, in the  
14 same paragraph: "It is expected that staff  
15 participation in these trainings will create  
16 consistency in job titles, expertise and credentials  
17 for personnel who are assigned as behavior experts  
18 in GNETS. After your staff have completed the RBT  
19 training sessions and earn the certification, they  
20 will be identified as GNETS Registered Behavior  
21 Technicians rather than behavior coaches, behavior  
22 specialists, behavior technicians, etc."

23 Do you see that?

24 A Yes.

25 Q Had you had any discussions with Ms.

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1 Rahming prior to receiving this draft about the need  
2 for consistency and job titles, expertise and  
3 credentials for personnel assigned as behavior  
4 experts in GNETS?

5 A I don't recall but we talked a lot about  
6 behavior and the program needs.

7 Q Okay. Did you have any behavior coaches,  
8 specialists, or technicians at North Metro GNETS at  
9 the time this was shared with you?

10 A I for sure had one behavior specialist,  
11 but I knew I needed more. So that's what I recall  
12 from the date.

13 Q Moving down, and this is the beginning of  
14 the third paragraph, it says: "Although the  
15 certification process is not required to complete  
16 the RBT training, it is required for GNETS staff.  
17 This will ensure that GNETS staff have a higher  
18 level of credentialing and should be certified as  
19 behavior experts when working with children  
20 presenting severe and intense behavioral challenges.  
21 They should also be credentialed beyond educators in  
22 the general school setting to ensure that students  
23 are receiving behavioral services beyond what could  
24 be provided in the home schools ."

25 Do you see that?



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1 A Yes.

2 Q Did you agree with this last statement,  
3 that GNETS staff should be credentialed beyond  
4 educators in the general school setting?

5 A I know it is written in the State Board  
6 Rule for GNETS that we will have extra  
7 credentialing.

8 Q And are the GNETS programs bound to adhere  
9 to the GNETS state rule?

10 A Yes. But it doesn't say it's required.  
11 It's recommended.

12 Q Do you agree with that recommendation?

13 A Yes.

14 Q Going farther down, in the third paragraph  
15 from the bottom, if you include the last sentence as  
16 a paragraph, it says -- do you see where it says  
17 "Upon receiving this credential"?

18 A Um --

19 Q It's a lot of words on this page.

20 A It's inside a paragraph?

21 Q Yeah. It's the third sentence in that  
22 third paragraph up from the bottom. It starts --

23 A Yes, I see it now.

24 Q Okay. It says: "Upon receiving this  
25 credential, it is expected that participants sign

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1 the attached Memorandum of Understanding (MOU) and  
2 commit to providing RBT services with GNETS for one  
3 year. Participants have the option to pay for their  
4 certification if they decide not to sign the MOU  
5 with their GNETS and fiscal agent."

6 Do you see that?

7 A Yes.

8 Q Was the it MOU referenced here in anyway  
9 related to the draft MOU that you had previously  
10 sent to Ms. Rahming?

11 A Yes.

12 Q What was the relationship?

13 A This MOU that she submitted to us was for  
14 one year without a stipend, and in my MOU I paid a  
15 \$1,500 stipend annually for the student -- for the  
16 staff who wanted to get the extra RBT certification  
17 if they wanted to remain with the program.

18 Q Okay. And am I remembering correctly that  
19 your MOU had a commitment of three years? Is that  
20 right?

21 A Yes. So they got a three-year extra  
22 stipend on top of their salary, \$1,500 each year.

23 Q Okay. In the second-to-last paragraph,  
24 and this is the -- begins with the language that's  
25 in bold, it says: "The RBT is primarily responsible

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1 for the direct implementation of skill-acquisition  
2 and behavior-reduction plans developed by the  
3 BCBA-D, BCBA or BCaBA."

4 A Yes.

5 Q "This supervision support will be  
6 available from TeachTown throughout the training.  
7 GaDOE will contract with TeachTown or collaborate  
8 with independent BCBAs or BCaBAs as well as GNETS  
9 and community agencies that employ BCBA-Ds, BCBAs or  
10 BCaBAs to ensure ongoing supervision is available  
11 for GNETS RBTs."

12 A Yes.

13 Q A lot of acronyms here.

14 You said earlier that North Metro did  
15 ultimately participate in this RBT training?

16 A Yes.

17 Q And did North Metro receive the ongoing  
18 supervision as described here?

19 A I think the first year TeachTown -- they  
20 provided the coursework for at least two years, but  
21 I think in the second year they no longer provided  
22 the BCBA supervision. But I had my own BCBAs that  
23 were qualified and certified to do the supervision  
24 on my RBTs.

25 Q Okay, understood.

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1 MS. GARDNER: I'd like to have this  
2 document marked as Plaintiff's Exhibit 638.  
3 (WHEREUPON, Plaintiff's Exhibit-638 was  
4 marked for identification.)

5 BY MS. GARDNER:

6 Q You have been handed what's been marked as  
7 Plaintiff's Exhibit 638. This is an email from you  
8 to Ms. Rahming, dated September 19, 2017, with the  
9 subject: "RE: RBT Notice."

10 This is Bates-stamped GA00793696.

11 A Yes.

12 Q Do you recognize this?

13 A Yes.

14 Q And is this your response to Ms. Rahming's  
15 draft RBT notice that we just looked at?

16 A Yes.

17 Q What was your response?

18 A That I wanted more than two RBTs to be  
19 able to be trained.

20 Q Was your proposed addition made to the  
21 notice?

22 A Yes.

23 Q Okay. And you did in fact opt to pay for  
24 more than two RBTs to be trained, correct?

25 A Yes.

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1 MS. GARDNER: I think we're at a logical  
2 stopping point, if it makes sense to take a  
3 break for lunch.

4 MS. MORRIS: Okay.

5 THE VIDEOGRAPHER: The time is 12:53 p.m.  
6 and we are off the record.

7 (A recess was taken.)

8 THE VIDEOGRAPHER: The time is 1:50 p.m.,  
9 and we are on the record.

10 MS. GARDNER: I just want to make sure  
11 before we get started that counsel for the  
12 State is back as well.

13 MS. JOHNSON: I'm back. Thank you. I  
14 appreciate you checking.

15 BY MS. GARDNER:

16 Q Welcome back.

17 A Thank you.

18 Q So we were talking earlier, and I believe  
19 on several occasions the State Board of Education  
20 GNETS rule has come up, right?

21 A Yes.

22 Q What is the State Board of Education GNETS  
23 rule?

24 A What is it?

25 Q Uh-hum. (Affirmative.)

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1           A       Basically it gives you a definition of  
2       what GNETS is, the services that were 24 programs  
3       across the State of Georgia, and it talks about the  
4       services and supports we provide and that the  
5       students are referred for therapeutic services  
6       through the IEP process.

7           Q       And I take it that that rule impacts your  
8       work as a GNETS director?

9           A       Yes, it does.

10          Q       How do you use the rule in your work as a  
11       GNETS director?

12          A       I basically use it as framework and a  
13       guide for, you know, what are we to do and the  
14       services we provide and how the students are  
15       referred in and out for services.

16          Q       Am I correct that the rule was modified in  
17       2017, and that a new State Board of Education GNETS  
18       rule went into effect that year?

19          A       Yes.

20          Q       Did the North Metro GNETS program provide  
21       feedback on the draft rule when the rule was in the  
22       process of being revised?

23          A       Yes.

24          Q       What kind of feedback did North Metro  
25       provide?

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1           A     One particular thing I think I asked for  
2     clarification on is the exit criteria, and I didn't  
3     see that it was listed in the new revised State  
4     Board Rule. So how are we to, you know, deal with  
5     that.

6           Q     And when you say the exit criteria wasn't  
7     listed in the new revised State Board Rule, was that  
8     something that had been in the previous State Board  
9     Rule?

10          A     Yes.

11          Q     And so that's something that you raised in  
12     the process of the rule being revised?

13          A     Yes. I just wanted to know how we were  
14     going -- if it was going to be a new name. If there  
15     was a rule change, how would, you know, we deal with  
16     that.

17          Q     And who did you sort of present that  
18     concern to?

19          A     It was probably Nakeba Rahming. I think  
20     she was our program manager at the time.

21          Q     And did you -- what, if anything, did you  
22     learn when you presented that?

23          A     I don't recall, but I think she just said  
24     we're not using that terminology anymore.

25          Q     Did Ms. Rahming provide an explanation for

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1 why that was happening?

2 A I think the exit criteria sounded too much  
3 like a hospital kind of terminology.

4 Q Okay. One more question and then I'm  
5 going to show you a document.

6 In terms of the feedback that North Metro  
7 provided on the draft rule when it was in the  
8 process of being revised, what was sort of the  
9 process that North Metro undertook in order to  
10 arrive at that feedback? Like how did you come up  
11 with feedback on the rule?

12 A Again, that's a long time ago, but I think  
13 there was public comment, a time frame for public  
14 comment to be made. And so when I was made aware of  
15 the State Board Rule, just reading through it and  
16 seeing if I had clarity or understood or wanted more  
17 specificity or whatever based on my input.

18 Q Okay.

19 MS. GARDNER: I'm going to ask the court  
20 reporter to please mark this as Plaintiff's  
21 Exhibit 639.

22 (WHEREUPON, Plaintiff's Exhibit-639 was  
23 marked for identification.)

24 BY MS. GARDNER:

25 Q You've been handed what's been marked as



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1 Plaintiff's Exhibit 639, and this is an email thread  
2 between you and Nakeba Rahming containing two emails  
3 from November and December of 2016.

4 The Bates-stamp on this document is  
5 GA00042647.

6 Do you recognize this?

7 A Yes.

8 Q And am I correct that this thread includes  
9 an email that you sent to Ms. Rahming on November 30  
10 of 2016, thanking her for all of her hard work on  
11 developing the new proposed GNETS State Board Rule  
12 and providing a combination of questions and  
13 comments by way of feedback?

14 A Yes.

15 Q The first thing that you write to Ms.  
16 Rahming is a question and it says: "What are GNETS  
17 supplemental aids and services? Are you referring  
18 to therapeutic supports we offer or are you  
19 referring to the same supplemental supports that  
20 other special education programs offer?"

21 Do you see that?

22 A Yes.

23 Q What were you trying to get at here?

24 A I just wanted to clarify. So, you know,  
25 if we're moving to The State Board Rule, that the

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1 services that we're supposed to be offering I had a  
2 clear understanding whether they were above and  
3 beyond or the same supplemental services that are  
4 currently referenced in IDEA.

5 Q And what did you learn in response to that  
6 question, if anything?

7 A I don't recall that I got a response.

8 Q The second question says: "Is it possible  
9 to provide a brief description of how IEP placement  
10 decisions are made so schools understand that it's  
11 not a vote or a unilateral decision of a building  
12 administrator?"

13 Do you see that?

14 A Yes.

15 Q What prompted this question?

16 A Sometimes when students are being referred  
17 for services, sometimes certain school districts  
18 would stack the deck, per se, and have a lot of  
19 people show up. Like in -- basically you think it  
20 was taking a vote on how you would decide whether or  
21 not a kid was eligible for a GNETS services or not.

22 Q And when you say "stack the deck," do you  
23 mean bring multiple people in that school, a  
24 classroom teacher, a special education teacher, an  
25 administrator, all of whom would presumably have

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1 some sort of --

2 A Yes.

3 Q -- critical vote in the final outcome?

4 A Yes.

5 Q Had you had experiences where there were  
6 differences of opinion about students who were being  
7 referred for GNETS services as between the GNETS  
8 program and then the building staff?

9 A The LEA? Yes.

10 Q Had you had experience where there were  
11 differences of opinions and, you know, where the  
12 deck was also stacked?

13 A Yes.

14 Q And how had you handled those situations  
15 previously?

16 A Just explained that, you know, determining  
17 IEP services and placement is not a vote; it's based  
18 on the data and the IEP team agreeing to what those  
19 services are and the best need of the student.

20 Q The third item here is feedback, and I  
21 believe this is what you were just speaking about,  
22 but you say: "The previous 'Exit Criteria'  
23 guidelines are missing from the proposed GNETS State  
24 Board Rule and we recommended adding them back in."

25 Do you see that?

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1 A Uh-hum. (Affirmative.)

2 Q Why was North Metro GNETS recommending the  
3 previous exit criteria guidelines be added back in?

4 A Sometimes it's hard for kids, once the  
5 team has decided that the child is really ready to  
6 go back to the LRE, that sometimes there's pushback.

7 Q Pushback from whom?

8 A Some of the school districts.

9 Q And so what, what would the exit criteria  
10 guidelines provide in a circumstance where there was  
11 pushback?

12 A Basically, it gave you a little bit of an  
13 explanation of the parameters of when kids are  
14 considered to, you know, be ready to move back into  
15 the LRE. And so instead the reintegration plan was  
16 the terminology that was substituted for the exit  
17 criteria.

18 Q Okay. Just so I'm clear, when there was  
19 exit criteria guidelines, are you saying that that's  
20 something that you could point school systems to if  
21 they were resistant to basically receiving GNETS  
22 students back into the home school district?

23 A Yes.

24 Q You said the reintegration plan was what  
25 ultimately replaced the exit criteria guidelines?

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1 A Yes.

2 Q And what is the reintegration plan?

3 A It basically is a plan that talks about,  
4 you know, once the child has met their behavioral  
5 criteria, what it looks like so we can train the  
6 school districts that's receiving the child back  
7 into the LRE, we train them on what we did for the  
8 child to be successful.

9 So it's like reintegrating them back into  
10 the LRE training, the receivers of those kids, to  
11 implement the strategies that were effective for us.

12 Q And you note in this third item, it says:  
13 "Also the new proposed GNETS State Board Rule does  
14 not reference the reintegration plan. We  
15 recommended adding that to the new GNETS rule."  
16 Correct?

17 A Yes.

18 Q Was a reference to the reintegration plan  
19 added to the rule?

20 A I think so, yes.

21 Q Just moving up to the later email you sent  
22 to Ms. Rahming, the one dated December 1st, 2016,  
23 you say: "I'd like to request that as you build  
24 your budget for next year that you consider adding  
25 additional funding to GNETS budget so we can hire a

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1 GNETS Reintegration/Transition Coach. These people  
2 will help us provide therapeutic supports to our  
3 students who have exited our program and our  
4 teachers so our students will be successful in their  
5 LRE."

6 Do you see that?

7 A Yes.

8 Q Did Ms. Rahming agree to fulfill this  
9 request?

10 A No.

11 Q Have you secured funding for reintegration  
12 or a transition coach since that time?

13 A No.

14 Q Is that something that you are still  
15 interested in having?

16 A I think it would be helpful.

17 Q And why do you think it will be helpful?

18 A Well, the kids that are currently  
19 receiving full GNETS services, all of our attention  
20 is meeting their needs. So at this point we do  
21 provide some coaching and support to the teachers  
22 when students are going back to the LRE, but it  
23 lessens the support for the GNETS students who are  
24 like our Tier III of Tier III students. So it kind  
25 of lessens the specific training and support for the

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1 kids that are most in need as well.

2 Q So is it fair to say that you don't have  
3 the bandwidth to both provide the supports to  
4 students who are transitioning back into their home  
5 systems and also meet the needs of sort of the  
6 students who are, you know, in the Tier III level --

7 A Yes.

8 Q -- of North Metro currently?

9 A Yes.

10 MS. GARDNER: I'd like to ask the court  
11 reporter to please mark this document as  
12 Plaintiff's Exhibit 640.

13 (WHEREUPON, Plaintiff's Exhibit-640 was  
14 marked for identification.)

15 BY MS. GARDNER:

16 Q You've been handed what's been marked as  
17 Plaintiff's Exhibit 640. This is an email from you  
18 to Nakeba Rahming, dated December 8, 2016, with the  
19 subject: "North Metro GNETS Reintegration Plan -  
20 Draft."

21 It includes one attachment that is a Word  
22 document with the file name "NM GNETS Reintegration  
23 Plan\_Draft\_R."

24 And this document is Bates-stamped  
25 GA00042977.

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1 Do you recognize this document?

2 A Yes.

3 Q Is this North Metro's draft reintegration  
4 plan that you are forwarding to Ms. Rahming?

5 A Yes.

6 Q And you tell Ms. Rahming that the  
7 reintegration plan is not done but you want her to  
8 see what you have so she can consider your request  
9 for a GNETS reintegration coach or coordinator to  
10 assist with implementation?

11 A Yes.

12 Q As a GNETS director, were you required to  
13 develop a reintegration plan?

14 A No.

15 Q So I want to talk about this reintegration  
16 plan.

17 In general, what is the purpose of this  
18 plan?

19 A Just to understand how we could make sure  
20 our students are getting what they need, and if they  
21 go back into the LRE, which is the last placement  
22 that referred them on for services, that once  
23 they've met their behavioral and academic goals,  
24 that they could go back and be successful there,  
25 because otherwise you have a high recidivism rate,



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1 if the teachers in the LRE don't know how to meet  
2 their needs.

3 Q When you say you have a high recidivism  
4 rate, you mean if the teachers in the LRE don't know  
5 how to meet their needs, those students just end  
6 back up at North Metro GNETS?

7 A They could, yes.

8 Q On the first page this includes a GNETS  
9 Continuum of Service Delivery & Environments.

10 Do you see that?

11 A Yes.

12 Q And at the very top it says: "GNETS  
13 services Provided in the 'General Education' Setting  
14 in Zoned or Public School."

15 Do you see that?

16 A Yes.

17 Q Does North Metro provide any GNETS  
18 services in the general education setting currently?

19 A It depends on if the child is in a  
20 co-taught classroom. Sometimes we will go in and do  
21 observations and provide the teacher with, you know,  
22 training and support that way. So it's not direct  
23 services to the student; it's to the staff.

24 Q So in the general education setting North  
25 Metro may provide services to staff, but not direct

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1 services to students?

2 A Yes.

3 Q And then the next sort of step on this  
4 Continuum of Service Delivery & Environments says:  
5 "GNETS Services Provided in 'Pull-Out' from the  
6 General Education Setting in Zoned or Public  
7 School."

8 Do you see that?

9 A Yes.

10 Q Does North Metro provide any GNETS  
11 services in a pull-out setting in general education?

12 A It's typically the same as, as a  
13 consultative model to the teachers in that  
14 environment.

15 Q So for this particular step on the  
16 Continuum of Service Delivery & Environments the  
17 North Metro GNETS program would be providing support  
18 to the teacher but not necessarily direct support to  
19 the student?

20 A Yes.

21 Q Where on this continuum does direct  
22 support to students begin in terms of the services  
23 provided by North Metro GNETS?

24 A When a GNETS student is actually in a  
25 GNETS classroom that is funded with GNETS staff.

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1 But in this continuum, it's a consultative  
2 -- the recommendation was for consultative services  
3 to be provided so as the child transitions from most  
4 restrictive to least restrictive that everybody has  
5 the proper training they need to meet the student's  
6 needs.

7 Q Is it fair to say from this reintegration  
8 plan that the idea behind the plan is that students  
9 returning to the general education environment will  
10 receive supports from the GNETS program while making  
11 that transition and that the support the GNETS  
12 program provides will gradually decrease as the  
13 student accrues more weeks in that LRE environment?

14 A Yes. If the student was successful.

15 Q So on this reintegration plan a student  
16 would begin with three days of face-to-face or  
17 virtual support from GNETS during their first and  
18 second weeks of being back in their LRE?

19 A Yes.

20 Q And then over time that would decrease to  
21 eventually one day per month during their 10th  
22 through 18th weeks?

23 A Yes.

24 Q Turn to the second-to-last page. This  
25 contains a North Metro GNETS PBIS Level System.

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1 Do you see that?

2 A Yes.

3 Q Can you explain the PBIS Level System  
4 addressed here?

5 A Basically PBIS is one overall system where  
6 we have classroom and schoolwide expectations of  
7 what the expected behaviors are, but as the student  
8 progresses over time they earn more privileges, and  
9 the reinforcements and the rewards are greater.

10 Q And is this the level system that applies  
11 in any North Metro GNETS classroom or center?

12 A It varies a little bit because some of our  
13 schools that are -- our programs are located, if  
14 they have their own PBIS system in that school, we  
15 follow that program, so our kids are following the  
16 same thing the other kids are following in the  
17 program -- in the school. Excuse me.

18 Q Would this be the PBIS Level System that  
19 applies in any North Metro GNETS center?

20 A Yes. And some of our traditional schools  
21 as well, because not all of the schools in our  
22 districts are PBIS schools.

23 Q Okay. So am I correct in understanding  
24 from this level system that to participate in all  
25 school events and activities, a student has to keep

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1 70 percent or more of their points for five  
2 consecutive days?

3 A Where are you seeing that?

4 Q On the very last page of this document.  
5 The definition for Level 1.

6 A Yes.

7 Q What happens if a student has 69 percent  
8 of their points or less?

9 A They still get earned reinforcements but  
10 they don't get the added privileges added back on.

11 Q Okay. So would a student who is at Level  
12 D would not be able to participate in all school  
13 events and activities?

14 A No. Anything that all students get, they  
15 get as well. But sometimes our students will get  
16 extra privileges on top of the schoolwide  
17 privileges. Because they are -- they had different  
18 interests and things that they wanted to work for.

19 Q Okay. And then according to this scale,  
20 above 70 percentage points for every additional 10  
21 percentage points there is some new level with  
22 privileges?

23 A Yes.

24 Q This chart references Automatic Level  
25 Drops. Do you see that on the first part of the

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1 first page of the level system?

2 A Level 3?

3 Q Well, where it says Automatic Level Drops.

4 A Uh-hum. (Affirmative.)

5 Q What is an automatic level drop?

6 A Meaning that if you get into a fight --  
7 because most of our kids, their behaviors really are  
8 for mostly physical aggression, destruction,  
9 elopement from building. And so when we see those  
10 types of behaviors, that shares -- that says to us  
11 that this child isn't really ready to have the level  
12 of independence to be able to go out into the  
13 general population because they've had habitual  
14 problems with these issues.

15 So the levels and the -- basically the  
16 reinforcements and the rewards are lessened at that  
17 point, because those are significant behaviors that  
18 really get our kids into trouble, and so we focus a  
19 lot on those behaviors. Those are a lot of our  
20 referring behaviors for most of our kids.

21 Q So does that mean -- if you have a level  
22 drop, does that mean that if were you at Level 3 and  
23 you engage in one of these behaviors that's listed  
24 here, you drop to Level 2 automatically?

25 A Yeah. We have a team meeting and we

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1 discuss it, but it means that it is definitely on  
2 the table for a level drop.

3 Q And what are the points that are  
4 referenced throughout this level system?

5 A It depends. Most of our schools use PBIS  
6 bucks, and so the bucks look differently. So  
7 whatever the school mascot is, that's what the level  
8 system really looks like.

9 So in exchange for, you know, a certain  
10 behavior for a certain period of time, you can earn  
11 -- it's like dollars that you could buy items,  
12 reinforcers, you know, off a PBIS card or extra time  
13 on a computer or, you know extra time doing some  
14 kind of sensory activity.

15 So they get reinforced for things they  
16 identify that they want to work for when they have  
17 appropriate behaviors, until it becomes automatic  
18 for them.

19 Q And is there some point sheet or some  
20 system by which you keep track of those points for  
21 students?

22 A Yes. We use the Oregon PBIS Reinforcement  
23 Sheets and SWIS data.

24 Q In terms of those sheets and the SWIS  
25 data, that's common across all of North Metro GNETS

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1 sites?

2 A It was until Gwinnett moved to Synergy.  
3 So their reinforcement system is built within their  
4 Synergy program, their platform.

5 Q So if, if North Metro GNETS doesn't have  
6 access to Synergy, how do you see the points?

7 A I don't, unless it's paper/pencil.  
8 My teachers have access that work in those  
9 buildings and serve the kids directly, but as a  
10 district level person I do not have access to that.

11 Q Do all of your teachers serving GNETS --  
12 sorry -- Gwinnett County students have access or  
13 only those that are teachers provided by Gwinnett  
14 County?

15 A So if they work in Gwinnett County  
16 schools, regardless of whether they are GNETS grant  
17 funded or LEA funded, they have access. But for my  
18 itinerate staff, which includes me, because I go to  
19 multiple sites, we don't have access.

20 Q Okay, understood.

21 MS. GARDNER: I'd like to ask the court  
22 reporter to mark this document's Plaintiff's  
23 Exhibit 641.

24 (WHEREUPON, Plaintiff's Exhibit-641 was  
25 marked for identification.)



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1 BY MS. GARDNER:

2 Q You've been handed what's been marked as  
3 Plaintiff's Exhibit 641. This is a document  
4 produced to the United States by North Metro GNETS  
5 program in response to a document subpoena, and this  
6 is not Bates-stamped but the temporary ID assigned  
7 to this is North Metro\_Temp\_005047.

8 The title of this document is "North Metro  
9 GNETS Students Tiers of Support in the Least  
10 Restrictive Environment (LRE)."

11 Do you recognize this document?

12 A Yes.

13 Q And is this a document you provided to the  
14 United States in response to its subpoena to North  
15 Metro GNETS program?

16 A Yes.

17 Q What is this document?

18 A This document is just an upgraded version  
19 of information that we need to consider for  
20 reintegration for a student. And so the IEP team  
21 and I, we sat down and we talked about what does  
22 that really look like in layman's terms, some of the  
23 things we need to consider.

24 It's still an IEP team decision as to when  
25 a child is ready to go back into the LRE, but when

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1 you think about when they've made some behavioral  
2 progress to get them ready to go back to be educated  
3 with their typical peers, you know, you might want  
4 to consider in the subject area where the child is  
5 the strongest first, that we consider moving them  
6 back into like their, their ELA class. And then  
7 after they make progress with that, if they're  
8 keeping up academically and behaviorally over a  
9 period of time, we add another out class, is what we  
10 sometimes refer them to.

11 But it basically is a class that's not run  
12 by a GNETS teacher.

13 Q And the subtitle here is "Protocol for  
14 Earning Academics and Electives in Non-GNETS classes  
15 in the LRE," right?

16 A Yes.

17 Q And that is basically the protocol for how  
18 you earn out classes?

19 A Yes.

20 Q So at the bottom of this document, on the  
21 first page, it says, "Student must meet IEP behavior  
22 goal criteria for a minimum of 6 weeks to earn their  
23 1st non-GNETS academic class."

24 A Yes.

25 Q Do you see that?

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1 That's the standard for earning the first  
2 out class?

3 A Yes.

4 Q And then after that first outclass, this  
5 says: "The time to earn remaining out classes will  
6 be determined by the IEP team."

7 A Yes.

8 Q So it varies if you're talking about a  
9 second out class or third out class?

10 A But we don't even consider talking about  
11 it until after the first six weeks, because a lot of  
12 times our kids, when they go out into out classes,  
13 which are general ed classes or less restrictive  
14 environment, they self-sabotage because the classes  
15 are so large and because of their mental health  
16 issues, sometimes they have meltdowns. So we want  
17 to make sure when they go out into the out classes  
18 they can handle it academically and behaviorally  
19 before just putting them in all out classes because  
20 they've earned the points or they have the grades.  
21 We want them to be successful.

22 Q On the first page in the second blue box  
23 from the bottom, the end of that box it says: "All  
24 GNETS segments/academics are to be provided on  
25 Tuesdays and Thursdays for FTE purposes."

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1 A Yes.

2 Q What does that mean?

3 A That means, just like every other special  
4 ed classroom in the State of Georgia, that on FTE  
5 count days, they have to be in those special ed  
6 classes on the FTE count day. That's statewide.

7 Q And so what's the significance of the FTE  
8 count day?

9 A That's how funding is determined for the  
10 traditional schools and also a GNETS program since  
11 we serve kids as special ed that have IEPs.

12 Q Does this mean the FTE count day is  
13 Tuesdays and Thursdays?

14 A Tuesdays and Thursdays. One in October,  
15 one in March. That's it. It's twice a year.

16 Q You have mentioned on several occasions  
17 today the GNETS Strategic Plan.

18 A Yes.

19 Q What is the GNETS Strategic Plan?

20 A Basically it was a plan that was put  
21 together by the DOE and then in collaboration with  
22 all the GNETS directors to address the concerns  
23 brought about by the DOJ.

24 Q How did you first become aware of the  
25 GNETS Strategic Plan?

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1           A     Nakeba Rahming, you know, explained to us  
2     what was going on from the lawsuit at the State  
3     level down into the GNETS program.

4           Q     And when you say "explained to us," you're  
5     talking about the GNETS directors?

6           A     Yes.

7           Q     When, roughly -- what was the time period  
8     when you first became aware of the GNETS Strategic  
9     Plan?

10          A     Um, I think it took a while. I think I  
11     became aware of the GNETS lawsuit, like I said,  
12     around 2012-ish, but the strategic plan, Nakeba  
13     Rahming was hired at the DOE to help us because of  
14     her background, experiences.

15                 So it may have been a year later, six  
16     months later, that she came in and started working  
17     on developing the plan because she had done similar  
18     work in Florida.

19          Q     Okay. Did Nakeba Rahming take the lead on  
20     developing the GNETS Strategic Plan?

21          A     She did.

22          Q     Did she draft that plan?

23          A     Yes.

24          Q     Is North Metro GNETS obligated to comply  
25     with the GNETS Strategic Plan?

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1 A Yes.

2 Q How does North Metro go about complying  
3 with the GNETS Strategic Plan?

4 A Well, we have a rubric that we are  
5 expected to monitor the progress of our program  
6 throughout the year. So we use the GNETS Strategic  
7 Plan and the expectations to monitor for fidelity to  
8 make sure we're addressing all the academic and  
9 behavioral and therapeutic needs of our students so  
10 at the end of it it has a self-assessment, where my  
11 leadership team and I come together from all of our  
12 different schools and school districts and we rate  
13 the program overall at the individual locations, but  
14 then we submit one plan as -- because we're one  
15 program.

16 Q Okay. And so you mentioned the  
17 self-assessment, the things that you're  
18 self-assessing your program for, are the components  
19 of the GNETS Strategic Plan?

20 A Yes.

21 Q How often does North Metro conduct that  
22 self-assessment?

23 A Three times a year.

24 Q Is there standardized information that  
25 needs to be provided in order to establish North

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1 Metro's compliance with the GNETS Strategic Plan?

2 A Yes.

3 Q And who establishes what that information  
4 is?

5 A It's included in the rubric. So we will  
6 know how to self-assess where we are with the  
7 language that explains whether or not we're emerging  
8 or operational in that particular area.

9 So we go through everything that we're  
10 doing in our program and we utilize that rubric and  
11 talk about where we are and where our needs are, and  
12 then we rank order everything at the end of the  
13 self-assessment and we prioritize where we need the  
14 most work on.

15 We submit that to the DOE at the end of  
16 each year, and they provide us feedback on where we  
17 are and ask us how we're planning to move forward  
18 with areas of weakness.

19 Q As part of the GNETS Strategic Plan  
20 process, are there onsite visits from the Georgia  
21 Department of Education in connection with that  
22 assessment process?

23 A There used to be.

24 Q When was the last time that the North  
25 Metro GNETS program had an onsite visit from the

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1 Georgia DOE?

2 A It was definitely prior to COVID.

3 Q Who conducted that onsite visit?

4 A Vickie Cleveland -- I'm not really sure if  
5 Lakesha was on board at the time. So I know it was  
6 at least Vickie Cleveland.

7 Q And what did that onsite visit entail?

8 A Basically, just our documents that are  
9 listed in the rubric. They would come through --  
10 they would do observations of all of our classrooms,  
11 walk through to see whether our standards were on  
12 the board, whether or not PBIS was being  
13 implemented, and then we would sit down and we would  
14 have our data notebooks to go through and they would  
15 talk about each of the items that were there.

16 Now all of this is submitted  
17 electronically, in that GNETS tab on the portal.

18 Q And when you say "we would sit down and we  
19 would have our data notebooks to go through," who is  
20 the "we"?

21 A Vickie Cleveland, the GNETS director, and  
22 any of the GNETS directors' designees, leadership  
23 team that she would invite to come to the meeting.

24 Q So when that, when that sort of meeting  
25 happened at North Metro, were there other folks on



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1 your leadership team who would participate in  
2 addition to yourself?

3 A Yes.

4 Q Who are those other people?

5 A Depending on which sites we were at,  
6 sometimes it was my -- definitely my site  
7 coordinator that ran the building on the day to day,  
8 the behavior specialist that was on board in that  
9 particular school and school district, and the  
10 curriculum specialist.

11 The school psychologist or social worker  
12 may come in and out of the meeting as needed, but  
13 those were the -- that was the typical makeup of the  
14 team.

15 Q Okay. And you noted before that as part  
16 of this strategic plan and assessment process that  
17 you would receive feedback from the Georgia DOE?

18 A Yes.

19 Q What kind of feedback do you -- have you  
20 received?

21 A Again, they go through -- now it's  
22 electronic rather than, you know, onsite. But they  
23 basically go through, look at our artifact, look at  
24 how we scored. They all let us know if we're  
25 missing information to justify or what-have-you, to

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1 upload those documents so they could review them.

2 And the specific examples that they give  
3 are listed within the rubric and the language.

4 Q And when you say the specific examples  
5 that they give are listed within the rubric, the  
6 specific examples of what?

7 A For example, one is behavioral and  
8 therapeutic support services. So it may ask things  
9 like how many FBAs and BIPs that I review program  
10 wide. How many of them met operational status. How  
11 many team members did I have trained in, you know,  
12 therapeutic services or SEL curriculum, like WhyTry  
13 or LIPT, those sorts of things.

14 So it gives you specific examples under  
15 each of the standards that we can submit.

16 Q Okay. And you're submitting them to sort  
17 of support a rating of either not evident, emerging,  
18 or operational?

19 A Correct.

20 Q Got it.

21 If there is like a deficiency or concern  
22 in an area of the strategic plan that's being  
23 assessed, what happens?

24 A Typically, we just develop an action plan  
25 to address the issue.

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1 Q Is that an action plan that you submit to  
2 the GaDOE?

3 A Yes. It's actually listed as a part of  
4 the self-assessment rubric.

5 MS. GARDNER: Let's have this document  
6 marked as Plaintiff's Exhibit 642.

7 (WHEREUPON, Plaintiff's Exhibit-642 was  
8 marked for identification.)

9 BY MS. GARDNER:

10 Q You've been handed what's been marked as  
11 Plaintiff's Exhibit 642. This is an email from you  
12 to Nakeba Rahming, Desiree Woods, Derrick Gilchrist,  
13 Lisa Futch, Jackie Neal, Kathy Lewis-Hawkins, and  
14 Deborah Gay, dated February 9, 2016, with the  
15 subject line "RE: Draft Strategic Plan."

16 This document is Bates-stamped GA00040621.  
17 Do you recognize this document?

18 A Yes.

19 Q Am I correct you write in this document:  
20 "Nakeba and All - Good morning. The strategic plan  
21 looks great. Below are my questions in red font"?

22 A Yes.

23 Q And your email was in response to an  
24 earlier email sent by Nakeba Rahming, correct?

25 A Yes.

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1 Q And in that email she says: "Please see  
2 the first draft of the plan that I began working  
3 on," correct?

4 A Yes.

5 Q And here she's referencing the GNETS  
6 Strategic Plan?

7 A Yes.

8 Q And that's a plan that you're commenting  
9 on in this email that you're sending back to Ms.  
10 Rahming and the other members of the group?

11 A Yes.

12 Q In Ms. Rahming's initial email, which  
13 appears on the second-to-last page of this document,  
14 she says: "I am attempting to make it an inclusive  
15 document so that you will not need to have multiple  
16 pieces of documents outlining the same work. I also  
17 incorporated the rating scale so we would not need  
18 to develop a second document. Debbie and I spoke on  
19 Friday and she supports us with moving away from the  
20 GCIMP and incorporating those items into the  
21 strategic plan. We also spoke about the core array  
22 of services application for funding and she  
23 indicated if we can show where the core array of  
24 services would be addressed and incorporated into  
25 the strategic plan with evidence of implementation

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1 to support the distribution of funding, she would be  
2 fine with dismissing that document as well."

3 Do you see that?

4 A Yes.

5 Q In this text where it says "Debbie and I  
6 spoke on Friday," is that a reference to Deborah  
7 Gay?

8 A Yes.

9 Q And who is Deborah Gay?

10 A She at the time was a state director of  
11 special education.

12 Q This also references the GCIMP.

13 A Uh-hum. (Affirmative.)

14 Q What is the GCIMP?

15 A Georgia Continuous Improvement Plan.

16 Q And what role, if any, has the GCIMP  
17 played prior to the development of the GNETS  
18 Strategic Plan?

19 A All special ed directors basically use  
20 that instrument to develop their continuous  
21 improvement plan, evaluating their roles of  
22 responsibilities and all that sort of thing.

23 Q Did the GNETS programs complete a GCIMP?

24 A You know, I don't recall. Maybe we did  
25 but I don't recall that we did.

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1 Q Okay. What is the core array of services  
2 application for funding?

3 A Basically, again, the special ed  
4 directors -- and she may have been referring to, you  
5 know, our old funding system with the paper/pencil,  
6 you know, grant application. So it asks very  
7 similar questions, of the services that we provide  
8 with the money that we were provided to meet the  
9 needs of the students.

10 Q Okay. At the end of Ms. Rahming's email,  
11 she says: "Remember, that the strategic plan will  
12 be your guiding document for practice and what you  
13 would be responsible for overseeing at your site."

14 Or it says "sties," but do you understand  
15 that to be sites?

16 A Yeah.

17 Q "A project management plan is being  
18 develop as a guiding document for the state  
19 responsibilities and what we will be doing to  
20 support you and your work with the GNETS program."

21 Do you see that?

22 A Yes.

23 Q Had the group that's receiving this email,  
24 which includes you, discussed the project management  
25 plan prior to the time of your receiving this email?

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1           A     I can't remember if it was before or  
2     after, but I do know that at one of our GNETS  
3     meetings we broke out into different groups and  
4     looked at different sections and provided feedback.

5           Q     On the project management plan?

6           A     Yes, which is basically the strategic  
7     plan.

8           Q     Okay. Because here she says a project  
9     management plan is being developed as a guiding  
10    document for the state responsibilities and what we  
11    will be doing to support you and your work with the  
12    GNETS program.

13                   Is that plan something that was provided  
14    to you at some point?

15           A     I think it was just her tweaking like how  
16    she meant in an earlier email that they were going  
17    to combine everything into one document so we didn't  
18    have several.

19                   So my best understanding of what that  
20    email is talking about is the revised GNETS  
21    Strategic Plan that had everything in one document  
22    instead of several separate ones.

23                   Did I answer the question?

24           Q     Uh-hum. (Affirmative.)

25           A     Okay.

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1 MS. GARDNER: I'm going to ask the court  
2 reporter to please mark this document as  
3 Plaintiff's Exhibit 643.

4 (WHEREUPON, Plaintiff's Exhibit-643 was  
5 marked for identification.)

6 BY MS. GARDNER:

7 Q Dr. Holifield, you've been handed what's  
8 been marked as Plaintiff's Exhibit 643.

9 This is an email from you to Nakeba  
10 Rahming, dated February 5th, 2016, with the subject  
11 line: "GNETS GCIMP Plan - Blank."

12 And it contains one attachment that is a  
13 Word document with the file name "FY15 GCIMP Plan  
14 Template."

15 The Bates number on this document is  
16 GA00062065.

17 Do you recognize this email?

18 A I do now.

19 Q I just want to ask you one quick question.  
20 We were talking about the GCIMP.

21 A Uh-hum. (Affirmative.)

22 Q Did you provide this to Ms. Rahming? And  
23 this document is titled, "GNETS Program Improvement  
24 Plan FY15."

25 A Uh-hum. (Affirmative.)



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1 Q Did this give you any additional  
2 information about whether GCIMP was something that  
3 was used with the GNETS program?

4 A Yes. After looking at this, we did use  
5 it, but it's been so long ago, yeah.

6 Q Do you know, I'm just wondering, the sort  
7 of structuring format of this identifies  
8 Actions/Strategies and Interventions, and then the  
9 person responsibility and the means of evaluation.

10 Were those kinds of elements taken from  
11 here and incorporated into the GNETS Strategic Plan?

12 A Um, I'm sure they were, but this is so  
13 different than what we've been doing so long now. I  
14 remember seeing this. So as I look at that actions  
15 and strategies, when I think about the GNETS  
16 Strategic Plan, there are actions and strategies for  
17 each of the different sections. So I would say that  
18 part was.

19 The professional learning, the resources  
20 -- yes, I guess. It's just a totally different  
21 format of looking at it, yes.

22 Q Okay.

23 MS. GARDNER: I'd like to have this  
24 document marked as Plaintiff's Exhibit 644.

25 (WHEREUPON, Plaintiff's Exhibit-644 was

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1 marked for identification.)

2 BY MS. GARDNER:

3 Q You've been handed what's been marked as  
4 Plaintiff's Exhibit 644.

5 This is the North Metro GNETS BOY  
6 Strategic Plan Rating Rubric, dated 8/17/21, and our  
7 internal temporary reference number is North Metro\_  
8 Temp\_005656.

9 Do you recognize this document?

10 A Yes.

11 Q And what is this document?

12 A The GNETS Strategic Plan.

13 Q And is this -- does this strategic plan  
14 contain North Metro's self-assessment ratings on  
15 each component of the GNETS Strategic Plan?

16 A Yes.

17 Q And was this provided to the United States  
18 in response to a document subpoena?

19 A Yes.

20 Q Am I correct, I think we've already been  
21 discussing for any given strategic plan objective  
22 North Metro can be rated either not evident,  
23 emerging, or operational, correct?

24 A Correct.

25 Q And not evident is the weakest rating; is

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1 that right?

2 A Yes.

3 Q And operational is the strongest?

4 A Yes.

5 Q I want to talk about a few of the areas  
6 where North Metro rated itself emerging.

7 A Okay.

8 Q On Page 6 of this document, do you see  
9 where it says "Implement Positive Behavior  
10 Interventions Supports"?

11 A Yes.

12 Q North Metro rated itself as emerging on  
13 this, correct?

14 A Yes.

15 Q And why was this rated emerging?

16 A This was the year of COVID. So we were at  
17 home. You can't implement behavioral strategies  
18 while kids are at home. So...

19 Q What, in your -- in North Metro's  
20 self-assessment this current school year, how is it  
21 rated on this particular objective?

22 A We're operational.

23 Q Under B, on the same page, "Trauma  
24 Informed Care Practices and Environment," that was  
25 also rated emerging?

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1           A       It was the same reason, the kids were at  
2 home, going through COVID, we couldn't...

3           Q       Okay. Turning to Page 9, am I correct  
4 that it says that North Metro rated itself emerging  
5 on B, "Ensure teachers maintain a positive and  
6 academically challenging learning environment in  
7 accordance with TAPS standards"?

8           A       Yes.

9           Q       What is TAPS?

10          A       Teacher -- teacher assessment practices.  
11                 So it's part of the TKES system. It's  
12 just broken down into standards and also elements.

13          Q       And why was this rated emerging?

14          A       Again, the kids were at home. The parents  
15 were teaching them. So we were -- we had online  
16 classes that were taking place virtually, just like  
17 the school district, but, you know, maintaining an  
18 academically rigorous environment when some of the  
19 kids were attending virtually and some of them were  
20 not, some parents were there, some were not. So  
21 those were all things outside of our control to make  
22 sure that they were getting -- they got everything  
23 that they were supposed to get as much as we could  
24 in a virtual environment.

25          Q       C. here was also rated emerging: "Ensure

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1 that students who demonstrate academic difficulties  
2 are matched to tiered interventions, supplemental  
3 instructional programs/materials that meet their  
4 needs."

5 A The same reason. I mean we provided them  
6 but we could not support the fidelity of  
7 implementation when parents were the ones at home,  
8 you know, really trying to help teach their kids in  
9 a virtual environment.

10 Q D. on this page was also rated emerging,  
11 which says: "GNETS certified and classified staff  
12 will attend instructional related trainings provided  
13 by GaDOE, RESA, LEAs, and conferences to ensure  
14 GNETS staff are aware of changes in the field and  
15 that instructional practices align with the state's  
16 expectations and standard."

17 A Our teachers participated in the trainings  
18 that were offered, most of which were trying to  
19 provide instruction on how to educate students with  
20 disabilities in a virtual environment, but whether  
21 or not, you know, it was the best training, that's  
22 why we rated ourself as emerging because it was very  
23 difficult just to utilize -- learn how to use the  
24 technology in such a quick period of time and how to  
25 break it out and do small groups and all of that

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1 using instructional technologies.

2 Q Moving to Page 12, North Metro rated  
3 itself emerging here on the "transition from GNETS  
4 Services: Ensure LEA and GNETS staff  
5 collaboratively establish attainable IEP goals to  
6 include a process for reviewing progress monitoring  
7 data for transition to the least restrictive  
8 environment."

9 What was the reason for that emerging  
10 rating?

11 A The same reason, our kids were on virtual  
12 and even though we provided those services and  
13 collaborated with the LEAs, there were just so many  
14 different moving pieces that just trying to make  
15 sure we could even talk about transition when  
16 everybody was home was very difficult.

17 Q And then on the next page, Page 13, the  
18 last area, North Metro rated itself emerging was D.,  
19 Parent Engagement.

20 What was the reason for that emerging  
21 rating?

22 A The same reason. Our parents at that time  
23 didn't even know how to use technology, and at that  
24 point, you know, we had a population of parents that  
25 did -- they were very savvy and had access to

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1 technology, but I think as a country, and even here  
2 in Georgia in our GNETS program, we really learned  
3 that many of our parents didn't even have access to  
4 internet. So engaging them and having them involved  
5 in the IEP process was challenging and new for them  
6 to be able to utilize their phones, many of which,  
7 like I said, didn't even have a laptop or a computer  
8 at all.

9 Q Turning to Page 15, this page is titled,  
10 "Self-Assessment Outcomes and Improvement Summary  
11 Plan."

12 Do you see that?

13 A Yes. So this is just a visual of what we  
14 just talked about, yes.

15 Q This summarizes the overall ratings given  
16 for each section of the strategic plan?

17 A Yes.

18 Q Okay. And then am I correct that North  
19 Metro is instructed to identify the top three  
20 priorities for an action plan?

21 A Yes.

22 Q And presumably the areas that you identify  
23 as priorities are those where you self-rated the  
24 lowest?

25 A Yes.

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1 Q And then this says that North Metro is to  
2 indicate why its team rated the item low and what  
3 it's going to do to improve its ratings --

4 A Yes.

5 Q -- correct?

6 A Yes.

7 Q And then this chart is basically North  
8 Metro complying with those instructions?

9 A Yes.

10 Q So on Page 18, there seems to be another  
11 version of this chart. I'm just wondering what the  
12 differences are.

13 A It's basically the same. They eliminated  
14 when they updated the -- they updated it since we  
15 did this. So they only have one of these.

16 Q Okay.

17 A Yes.

18 Q On Page 18 am I correct that North Metro  
19 identified instructional and academic support as its  
20 No. 1 priority?

21 A Yes.

22 Q In terms of why this was selected as a  
23 priority, this says "some items in this section were  
24 not rated as operational due to paraprofessionals covering  
25 some of our classes and low TKES scores."



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1 Do you see that?

2 A Yes.

3 Q When this says "para pros covering some of  
4 our classes," is that parapros covering classes  
5 without a certified teacher?

6 A Well, we had teachers in classrooms, but  
7 what we had to do, in order to meet the  
8 individualized needs, when we had to put kids in  
9 small groups the teacher could only be in one  
10 virtual classroom at one time, where the parapros,  
11 which is an instructional para, would be under the  
12 supervision of the teacher carrying out the academic  
13 interventions and the behavioral interventions as  
14 well.

15 So -- does that make sense what I'm  
16 saying? They have breakout rooms. So you have one  
17 classroom with different breakouts that the parents  
18 were helping to implement as the teacher rotated in  
19 a virtual classroom. So the teacher always had  
20 access but she could not be in multiple small groups  
21 at the same time.

22 Q Okay. And then this also says that this  
23 was rated a priority due to low TKES scores. TKES  
24 scores apply to the teachers, not the parapros?

25 A Yes.

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1 Q Is that right?

2 A Yes. Again, they had not really had this  
3 level of experience with teaching virtually.

4 Q Then the second area that North Metro  
5 identified as a priority was integration of services  
6 and capacity building --

7 A Yes.

8 Q -- is that right?

9 And in the box where it asks why this was  
10 selected as a priority, it says: "None of our  
11 students met IEP goals/criteria to transition from  
12 the program as planned."

13 A Right. Because, again, in a virtual  
14 environment there was no transitioning that was  
15 occurring. Everybody was at home. So just having  
16 conversations about moving to the LRE did not occur  
17 because there was no LRE to go into. The kids were  
18 all struggling academically and behaviorally, and we  
19 couldn't, you know, take behavioral data when they  
20 were at home because the parents were the ones that  
21 were implementing.

22 Q In the actions necessary to improve this  
23 area, it says: "We will monitor our students' IEP  
24 goals using available data more frequently to  
25 identify student who at-risk for not transitioning

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1 from the program as expected and begin working with  
2 students on an individual level."

3 Do you see that?

4 A Yes.

5 Q Has North Metro taken any steps --

6 A Yes.

7 Q And when this says that "North Metro will  
8 monitor students' IEP goals using available data  
9 more frequently," what available data does that  
10 refer to?

11 A Well, it goes back to the academic and the  
12 behavioral data that's written in each of their IEP  
13 goals and also their reintegration plans that we  
14 talked about. And during COVID there was no real  
15 reintegration that could take place. So we knew at  
16 that point there was nothing -- it was out of our  
17 control, really, to be able to talk about  
18 reintegration and transition when there was no  
19 opportunity at that point.

20 Q So given that you've implemented this, how  
21 much more frequently does North Metro now monitor  
22 student's IEP goals?

23 A All the time. I mean we have -- IEP  
24 meetings are at least once a year, but we have  
25 progress meetings with the parents. We send home

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1 report cards along with the other school districts  
2 requirements, but we also have our teacher send home  
3 progress reports as well on IEP goals and  
4 objectives. So, yes.

5 Q How many students has North Metro  
6 identified as being at risk for not transitioning  
7 from the program as expected under this protocol  
8 that is outlined here?

9 A I don't understand the question. Could  
10 you repeat?

11 Q Sure. This says that "we will monitor our  
12 students' IEP goals... to identify students who are  
13 at risk for not transitioning from the program as  
14 expected." So I'm just wondering how many students  
15 have been identified being at risk for not  
16 transitioning from the program as expected?

17 A Well, it's based on each individual  
18 student and, again, you know, it's on a case by  
19 case. It's not program wide. It's based on each  
20 individual student's behavioral or academic goals  
21 whether or not they transition or not.

22 But I don't have a number or percentage  
23 because it's for each individual student.

24 Q Did you know if you've identified any  
25 students who are at risk for not transitioning?

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1           A       I don't know how to answer that question.  
2       I'm sorry.

3           Q       I'm just wondering if there's any students  
4       who have been identified as being at risk for not  
5       transitioning?

6           A       Not to my knowledge, because the  
7       expectation is that all students will transition  
8       when they're ready. So when we have all the  
9       students in our program, I think our common goal is  
10      for them to transition back to the LRE, but I can't  
11      say that you're going to transition tomorrow, you're  
12      going to transition next week. So that's why I'm  
13      confused about how to answer that question.

14          Q       Okay. I'm just reading what it says here,  
15      and it says that you're going to identify students  
16      who are at risk for not transitioning from the  
17      program as expected.

18          A       And I think that's part of like when we do  
19      the BASC-3 and we do those interventions in the  
20      tiered system of -- at minimum they get three times  
21      a month of the small group services, and as they  
22      have more significant behavioral issues, we provide  
23      more interventions based on that.

24          Q       Okay.

25          A       Okay.

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1 Q You've mentioned COVID and the impact of  
2 COVID with respect to a number of these. Is there a  
3 reason why North Metro doesn't explicitly discuss  
4 COVID in this document?

5 A Not really. I mean I think it was just  
6 common practice. We had to do COVID plans. I don't  
7 even remember what the name is but the State of  
8 Georgia had everyone in the State of Georgia do like  
9 these -- I don't remember the name of the plan. So  
10 we had to do individual plans for our students as  
11 well. So...

12 Q Okay. We talked -- or we have sort of  
13 just generally talked about the students that North  
14 Metro GNETS serves but I want to talk a little bit  
15 about sort of how students find themselves at North  
16 Metro GNETS.

17 So can you just walk me through an  
18 overview of what the referral process is for a  
19 student being considered for services at North  
20 Metro?

21 A Yes. Typically, a school system will have  
22 a situation with a student who is being very  
23 aggressive and they're eloping and there's -- like  
24 they will leave the building. Sometimes we have  
25 kids that are very aggressive or producing

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1 self-interest behaviors.

2 So the school districts, the teachers and  
3 the district level behavioral specialists, they have  
4 a school behavior specialist, they provide  
5 interventions for the student. And if they are  
6 still finding the interventions they are  
7 implementing aren't working, then they will call on  
8 support from GNETS to say, hey, this might be a kid  
9 we may need your help with.

10 So we sit down and look at all the data  
11 and the referral processes, determine whether they  
12 need to be referred or the school district needs to  
13 implement their behavior intervention plan with more  
14 fidelity.

15 Q And is there any sort of formal process or  
16 paperwork or other things that a district will fill  
17 out to get the process --

18 A Yes.

19 Q -- sort of formally started?

20 A Yes. We have a request for services,  
21 referral packet, basically.

22 So the school district will say, you know,  
23 we've done everything we can, we really need your  
24 experts to come in and help us support the student.  
25 And so they will complete a packet. We will go over

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1 it.

2 Then we will go out and, like I said, do  
3 behavioral observation. We'll go through -- look at  
4 the IEP, the FBA and the BIP to see if they are  
5 implemented with fidelity and give feedback of  
6 things that they need to try more or change before  
7 referring a student on to GNETS services.

8 And if it doesn't appear to be in order.

9 Q And if everything, you know, does appear  
10 to be, quote-unquote, in order, what's the next step  
11 after you receive the packet?

12 A The next step is, is that the district --  
13 well, the referring school will contact the parents  
14 for an IEP meeting and say, hey, we really need to  
15 have, you know, someone from GNETS sit at the table  
16 along with other agencies or placement options that  
17 the school district is considering for that student  
18 to have a conversation about how we can best meet  
19 his or her needs.

20 Q And does somebody from North Metro GNETS  
21 participate in the IEP meeting when there is a  
22 consideration of GNETS services?

23 A Yes.

24 Q And is that sort of an absolute, that  
25 there always would be somebody from the North Metro



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1 GNETS participating?

2 A Yes, they're supposed to be.

3 Q Who from your staff typically participates  
4 in those IEP meetings?

5 A If it is -- my site coordinators that work  
6 in each of the districts, they're always invited to  
7 attend those meetings. The behavioral specialist,  
8 school psychologist is also invited.

9 If it's a really contentious case, I'm  
10 invited to attend as well.

11 Q Do you ever have communications with the  
12 Georgia Department of Education about students that  
13 school districts want to refer to North Metro GNETS  
14 program?

15 A I'm sure I have. I can't think of one  
16 offhand but I'm sure I have.

17 MS. GARDNER: Let me ask the court  
18 reporter to please mark this document as  
19 Plaintiff's Exhibit 645.

20 (WHEREUPON, Plaintiff's Exhibit-645 was  
21 marked for identification.)

22 BY MS. GARDNER:

23 Q You've been handed what's been marked  
24 Plaintiff's Exhibit 645.

25 This is an email from you to Vickie

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1 Cleveland, dated April 26, 2018, with the subject  
2 "RE: State Charter Schools."

3 A Uh-hum.

4 Q The Bates-stamp on this document is  
5 GA00319999.

6 Do you recognize this?

7 A I do.

8 Q And your email to Ms. Cleveland on August  
9 26th, saying "Definitely," is the most recent email  
10 in a longer thread related to GNETS and state  
11 charter schools, correct?

12 A Yes.

13 Q And am I correct that if you begin from  
14 the bottom of the email thread, which is the first  
15 email in time, that Steve Rains reached out to  
16 Vickie Cleveland on April 26, 2018 and asked: "Can  
17 state charter schools refer students directly to  
18 GNETS without going through the LEA?"

19 A Yes.

20 Q Who is Steve Rains?

21 A He is a GNETS director that has now  
22 retired.

23 Q And what program was he director of?

24 A It was mid Georgia -- I think it was a  
25 Burwell program.

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1 Q Ms. Cleveland then forwards Steve Rains'  
2 email to you and says: "See email from Steve below.  
3 Do we have a procedure for this?"

4 Do you see that?

5 A Yes.

6 Q Who did you understand the "we" here to  
7 refer to when Ms. Cleveland said "Do we have a  
8 procedure for this?"

9 A I assume GNETS.

10 Q Did you have any understanding as to why  
11 Ms. Cleveland was reaching out to you to ask about  
12 this issue?

13 A No.

14 Q What was your response to Ms. Cleveland?

15 A Um, I think we can refer students but they  
16 have to follow the continuum of services, if I  
17 recall.

18 Q And then am I correct Ms. Cleveland says  
19 to you: "Ok. We've had a few questions come up  
20 around this. I need to get something in writing for  
21 everyone."

22 A Yes.

23 Q You responded "Definitely"?

24 A Yes.

25 Q When Ms. Cleveland said I need to get

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1 something in writing for everyone, who did you  
2 understand everyone to refer to?

3 A The GNETS directors.

4 Q So it's fair to say that Ms. Cleveland was  
5 indicating she needed to get the GNETS directors  
6 written guidance on charter schools referring  
7 students to GNETS?

8 A Yes.

9 Q Did you ever receive anything in writing  
10 from Ms. Cleveland on this issue?

11 A No.

12 Q Is the state charter school issue and  
13 GNETS one that you have confronted with respect to  
14 North Metro in particular?

15 A Yes.

16 MS. GARDNER: I'd like to mark that as  
17 Plaintiff's Exhibit 646.

18 (WHEREUPON, Plaintiff's Exhibit-646 was  
19 marked for identification.)

20 BY MS. GARDNER:

21 Q You've been handed what's been marked as  
22 Plaintiff's Exhibit 646. This is an email from you  
23 to Vickie Cleveland and Zelfhine Smith-Dixon, dated  
24 February 19, 2019, with the subject "RE: Assistance  
25 Needed Fwd: GNETS Referral by ICSAtlanta."

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1 This document is Bates-stamped GA00094762.

2 Do you recognize this?

3 A Yes.

4 Q What is ICS Atlanta?

5 A It's one of the charter schools.

6 Q And you write in your email to Ms.

7 Cleveland and Ms. Smith-Dixon, quote: "Vickie's

8 timeline below is what I recall as well."

9 Do you see that?

10 A Yes.

11 Q Am I correct that your email and the  
12 emails in the thread that preceded your email relate  
13 to ICS Atlanta's attempts to determine how one of  
14 the students enrolled in its charter school could be  
15 considered for GNET services?

16 A Yes.

17 Q And just so we're clear, who is Zelphine  
18 Smith-Dixon?

19 A She was a state special ed director.

20 Q Okay. Would you explain generally what  
21 the issue was with ICSAtlanta having a student  
22 served in GNETS?

23 A I'm trying to go through these notes  
24 really quickly, but I think the issue was -- is that  
25 there are state chart schools and there are private

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1 charter schools. And so the charter schools felt  
2 like this student really needed GNETS services, but  
3 just like a traditional school has different  
4 placement options, most of the charter schools do  
5 not. And so the question was if it's -- I don't  
6 remember if it was a state or a private -- do they  
7 still have to unenroll the student to enroll them  
8 into the district program, or since they're their  
9 own school district, can they refer a kid to  
10 GNETS -- for GNET services if they are their own  
11 charter school district.

12 Q Okay. And am I correct that in this email  
13 thread, and this is on the third page, that Michele  
14 Neely of ICSAtlanta reached out to Zelphine  
15 Smith-Dixon to provide an overview of ICSAtlanta's  
16 efforts to determine how to get GNETS services for  
17 an ICSAtlanta student?

18 A Yes.

19 Q At the bottom of that email from  
20 Ms. Neely, and this is on the very last page, she  
21 writes: "We request that you advise North Metro  
22 GNETS to proceed with this IEP team meeting, even  
23 though the administrative logistics have not yet  
24 been worked out. We also appreciate your assistance  
25 in determining once and for all how our students

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1 should access GNETS services."

2 Do you see that?

3 A Yes.

4 Q What IEP meeting was Ms. Neely referring  
5 to?

6 A The student that was in question, that  
7 they were trying to refer to GNETS.

8 Q And was North Metro resisting moving  
9 forward with that IEP meeting?

10 A I went out and did an observation of the  
11 student. I personally went, along with my  
12 behavioral specialist.

13 Q Right. And so here ICSAtlanta is  
14 requesting to move forward with an IEP team meeting.  
15 I'm just wondering if that IEP team meeting had been  
16 on hold for some reason?

17 A They never filled out a packet, a referral  
18 packet. So they didn't even -- they didn't know the  
19 process and they didn't know how to move forward  
20 with the process. So they were trying to inquire  
21 from the DOE to get guidance on whether or not,  
22 since they are their own charter school district,  
23 did they have to unenroll, because they owned the  
24 student basically, and they didn't have the full  
25 continuum of services. So if the student needed

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1 GNETS services, how do they proceed, and they were  
2 just trying to get clarification on that.

3 Q And they had reached out to the DOE, you  
4 said, to get clarification on that?

5 A Yes.

6 Q As far as you know, was there any  
7 determination as to how a state charter school like  
8 ICSAtlanta should work with GNETS to have its  
9 students served?

10 A Well, again, it was -- it's still cloudy  
11 territory because there seems to be a difference  
12 between a state charter and a private charter and --  
13 I don't recall ever getting any written guidance  
14 because the referral process from a school district  
15 I assume should be very similar to a charter  
16 district, but the way that they are organized, there  
17 was question about whether the child had to  
18 unenroll, or if he stayed with the charter district  
19 and the charter district just referred from their  
20 program straight to GNETS.

21 I know there's like a lot but it was very  
22 confusing.

23 Q Was the particular student at issue in  
24 this email exchange ever served at North Metro?

25 A I think their -- I want to recall, and I



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1 can't -- I did the observation but I don't recall if  
2 the child actually was ever referred to GNETS  
3 because, if I recall, and I could be wrong, I think  
4 the parents refused to have GNETS at the table. And  
5 I think they pulled the child out of the services  
6 and he enrolled on his own through the parents into  
7 one of our district programs, and the referral went  
8 through that -- through that process.

9 They didn't want -- some kind of way the  
10 child -- I'm pretty sure the child moved into one of  
11 my other districts and the referral took place then.  
12 But I'm not sure.

13 It did not happen through the charter,  
14 though.

15 Q And when you say the parents refused to  
16 have GNETS at the table, what table were you talking  
17 about?

18 A They didn't want GNETS to move forward  
19 with the IEP meeting at the charter school.

20 MS. GARDNER: We've been going for, I  
21 don't know, an hour and 15 minutes. Would you  
22 like a break?

23 THE WITNESS: I want to go home.

24 MS. GARDNER: Then we'll keep going. I  
25 think the videographer is going to stop us in

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1 about 15 minutes, to switch something out.

2 Okay.

3 Q I think earlier you referenced a number of  
4 assessments, including the SDQ and the BASC-3.

5 And those are -- am I correct in  
6 remembering those are assessments given to determine  
7 where students are behaviorally?

8 A Yes.

9 Q And iReady is an assessment used to  
10 determine where students are academically?

11 A Yes, in reading and math.

12 Q Okay. Is there a calendar on which you  
13 administer iReady diagnostic tests?

14 A Yes. Usually the DOE will give us a  
15 window, and they will say, you know, we need to do  
16 our beginning of the year diagnostic time frame, and  
17 our mid year and the end of the year.

18 Q Okay. And is that a window that's given  
19 to all GNETS directors?

20 A Yes. We do have a little flexibility.  
21 Like if we say our school district is going to be on  
22 fall break or something like that, they may extend  
23 the window. But it's typically around the same time  
24 frame.

25 Q But the Department of Education prescribes

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1 sort of what those windows are for all the GNETS  
2 programs?

3 A Yes.

4 Q Is there a fee associated with using the  
5 SDQ?

6 A We -- there is a fee -- there wasn't a fee  
7 initially, but it seems like there was a fee for  
8 scoring, not actually for the instrument but for  
9 scoring there is a fee if you use their electric  
10 scoring platform.

11 Q And who pays for the costs of scoring the  
12 SDQ?

13 A GNETS does now out of the state budget.

14 Q Each individual program does out of the  
15 state budget?

16 A Yes.

17 Q Has it always been that way?

18 A I don't think it was. I think initially  
19 it seemed like the DOE paid the SDQ scoring invoice  
20 for all GNETS programs.

21 Q Okay. Is there a fee associated with  
22 using the BASC-3?

23 A Yes. There's a fee, but the DOE has paid  
24 for the BASC because it's falling under their  
25 window. So even though we have individual programs,

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1 the scores are reported back directly to the DOE.

2 Q So you --

3 A I mean we get them, too.

4 Q Okay. You don't have to manually report  
5 them to the DOE, the DOE automatically gets them?

6 A Right, because they have an account.  
7 They're like the umbrella account and we fall  
8 underneath that.

9 Q And the DOE covers the costs for the  
10 BASC-3 for all the GNETS programs?

11 A I think so. They used to.

12 Q They cover the BASC-3 for North Metro  
13 GNETS currently?

14 A I actual have my own BASC-3 accounts  
15 because they have other assessments that I utilize  
16 as well. So I have to different accounts. I have  
17 one that the DOE, and I'm pretty sure they still  
18 fund that account, but I have extra BASC accounts  
19 that the DOE does not fund.

20 Q And that's for additional assessments?

21 A Yes.

22 Q Does North Metro report its SDQ scores to  
23 the GaDOE?

24 A No, because, again, they used to have the  
25 electronic scoring. So we use that information for

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1 our triangulation data to identify at risk and  
2 clinically significant behaviors.

3 Q When you said they used to have the  
4 electronic scoring and you did not report SDQ  
5 results to the Georgia Department of Education, did  
6 the Georgia Department of Education have access to  
7 those scores automatically or you just never  
8 reported that?

9 A I'm trying to remember how -- because I  
10 actually have -- I don't recall that we had to ever  
11 report it. I don't remember. I don't remember.

12 I'm sure we did but I can't swear to it.  
13 I don't remember.

14 MS. GARDNER: Could I please have this  
15 document marked as Plaintiff's Exhibit 647.

16 (WHEREUPON, Plaintiff's Exhibit-647 was  
17 marked for identification.)

18 BY MS. GARDNER:

19 Q You've have been handed what's been marked  
20 as Plaintiff's Exhibit 647.

21 This is an email thread between you and  
22 Nakeba Rahming from August 9, 2016.

23 This document is Bates-stamped GA00063361.

24 Do you recognize this?

25 A Yes.

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1 Q In the earliest email in this thread,  
2 which is at the bottom, you write to Nakeba Rahming  
3 on August 9th, 2016, and you say: "My curriculum  
4 specialist and I have been meeting how we need to  
5 collect and report out on all our required  
6 assessments"?

7 A Uh-hum. (Affirmative.)

8 Q "Are you going to provide us with  
9 spreadsheets? If so, will you provide us guidance  
10 and a spreadsheet on how you'd like us to report the  
11 following: BASC-3, SDQ, iReady/iMath."

12 Do you see that?

13 A Yes.

14 Q The BASC-3, the SDQ, and the iReady/iMath  
15 are the required assessments that you were referring  
16 to in your email?

17 A Yes.

18 Q And then correct that Ms. Rahming replies  
19 that "you will not be required to submit any data on  
20 the BASC and i-Ready. I will already have access to  
21 the database for all programs."

22 And then farther down she says: "The SDQ  
23 is the only one that will require submission"?

24 A Yes.

25 Q Does this refresh your recollection at all

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1 on whether you were required to submit SDQ scores to  
2 the Georgia DOE?

3 A Yes.

4 Q And you were?

5 A Yes. It's part of the triangulation data.  
6 So that's why it's not -- yes.

7 MS. GARDNER: I'd like to ask the court  
8 reporter to please mark this document as  
9 Plaintiff's Exhibit 648.

10 (WHEREUPON, Plaintiff's Exhibit-648 was  
11 marked for identification.)

12 BY MS. GARDNER:

13 Q You have been handed what's been marked as  
14 Plaintiff's Exhibit 648. This is an email from you  
15 to Nakeba Rahming and various GNETS directors, dated  
16 July 26, 2016, with the subject line: "RE: GaDOE's  
17 Update to DOJ."

18 A Uh-hum. (Affirmative.)

19 Q This document is Bates-stamped GA00063211.  
20 Do you recognize this email?

21 A Yes.

22 Q And in this email you're commenting on an  
23 update that the Georgia DOE provided to DOJ  
24 regarding the work occurring in GNETS programs --

25 A Yes.

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1 Q -- is that accurate?

2 A Yes.

3 Q And your email follows an earlier email  
4 response from Kathy Lewis-Hawkins?

5 A Yes.

6 Q Who is Ms. Lewis-Hawkins?

7 A She was a GNETS director that is now  
8 retired.

9 Q You write in your email: "The past four  
10 years have been tough and this letter represent as  
11 positive public acknowledgment that we're all  
12 working hard and doing the right work, good work for  
13 our students. Your dedication and commitment to  
14 fighting for GNETS is evident in not only your moral  
15 support, but also in the implementation of our new  
16 GNETS Strategic Plan, SLDS Platform, the upcoming  
17 new GNETS State Board Rule, and our unified  
18 research-based assessment tools that we didn't have  
19 to have a bake sale to be able to purchase."

20 Do you see that?

21 A Uh-hum. (Affirmative.)

22 Q When you said "our unified research-based  
23 assessment tools," what assessment tools were you  
24 referring to?

25 A The iReady reading and math, and also the



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1 BASC-3, and the SDQ.

2 Q When you say "unified," does that mean  
3 that all of the GNETS programs were using those same  
4 assessment tools?

5 A Yes.

6 Q It was something that Ms. Rahming had  
7 implemented?

8 A Yes.

9 Q You say "we didn't have to have a bake  
10 sale to purchase" the research base assessment tools  
11 that you reference. Who is the "we"?

12 A GNETS directors.

13 Q What did you mean by this comment?

14 A Well, I mean, part of the feedback that we  
15 got from all of the start of the DOJ report is, is  
16 that all GNETS were using different assessments, and  
17 so in order for us to have a common reporting  
18 system, we had to purchase that. Well, our funding  
19 is tight as it is, and then to figure out how to do  
20 this.

21 So when she came up with a plan and was  
22 able to utilize funds for us to be on the same page,  
23 it was very supportive.

24 Q Had North Metro in particular struggled to  
25 finance assessment tools in the past?

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1           A     We utilized different assessment tools  
2     based on what -- so, yes, but we also utilized what  
3     our districts used. So when you're not utilizing  
4     the same assessments to be able to report on one  
5     program in multiple locations and multiple school  
6     districts, it's hard because you don't have any  
7     common tools to report on.

8           Q     Okay. And you can't assess students sort  
9     of on some common -- across some common metric?

10          A     Right.

11          Q     IEPs have also come up on several  
12     occasions. Does the North Metro GNETS program  
13     provide any reporting to the Georgia Department of  
14     Education about the IEPs of students at North Metro  
15     GNETS?

16          A     Only when they would come out or have a --  
17     submit examples of IEPs as a part of our strategic  
18     plan.

19          Q     So you were sometimes asked by the DOE to  
20     submit examples of IEPs in connection with your  
21     GNETS Strategic Plan and assessment process?

22          A     Yes.

23          Q     And how would that process work?

24          A     I think they were -- at the time what I  
25     recall is making sure that our IEPs were based on

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1 academic and behavioral needs and individual  
2 supports and that the data that we were collecting  
3 was really relevant to what the students' needs  
4 were.

5 They also I think really had a laser focus  
6 to see if we were utilizing the data from iReady  
7 reading and math as part of our goals and objectives  
8 and our progress monitoring so we could have those  
9 common reporting pieces.

10 Also the BASC-3, we -- and the SDQs, we  
11 also were expected to list the clinically  
12 significant or at-risk behaviors as a part of our  
13 present levels of performance and help use that  
14 information for writing our behavioral goals as  
15 well.

16 Q So am I correct in understanding then that  
17 you would submit sample IEPs to the Georgia  
18 Department of Education and they would review them?

19 A Yes. They would tell us, you know, I need  
20 you to submit one EBD high school students, you  
21 know, whatever, one ASD middle school student's IEP,  
22 and they would go through and basically evaluate it  
23 for, you know, compliance.

24 Q Did you ever get requests for IEPs that  
25 would provide you with actual student names of files

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1 that the Georgia DOE wanted to see?

2 A Not that I recall. I think we had to  
3 de-identify it.

4 Q When you submitted those student IEP files  
5 and the Georgia DOE reviewed them, would they  
6 provide feedback to you on those files?

7 A Yes.

8 Q And that was in connection with the GNETS  
9 Strategic Plan process?

10 A Yes.

11 Q We were being compliance monitored prior  
12 to the strategic plan.

13 THE VIDEOGRAPHER: The time is 3:25 p.m.,  
14 and we are off the record.

15 (A recess was taken.)

16 THE VIDEOGRAPHER: The time is 3:36 p.m.,  
17 and we are on the record.

18 (WHEREUPON, Plaintiff's Exhibit-649 was  
19 marked for identification.)

20 BY MS. GARDNER:

21 Q Dr. Holifield, I am going to hand you what  
22 has been marked as Plaintiff's Exhibit 649.

23 This is an email from you to Vickie  
24 Cleveland, dated May 17th, 2019.

25 And this document is Bates-stamped

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1 GA00345934.

2 Do recognize this email?

3 A Yes.

4 Q And in this you say: "I'm checking I to  
5 see when you're going to email me my three student  
6 file names. My review is on May 22."

7 Do you see that?

8 A Yes.

9 Q This is relating to the kinds of requests  
10 for student IEP files that we just discussed?

11 A Yes.

12 MS. GARDNER: I'm going to ask the court  
13 reporter to mark this document as Plaintiff's  
14 Exhibit 650.

15 (WHEREUPON, Plaintiff's Exhibit-650 was  
16 marked for identification.)

17 BY MS. GARDNER:

18 Q You've been handed what's been marked as  
19 Plaintiff's Exhibit 650. This is an email thread  
20 between you and Nakeba Rahming from March of 2016.  
21 The most recent email is one that you sent to Ms.  
22 Rahming on March 4, 2016, with the subject "Re:  
23 Agenda."

24 This document is Bates-stamped GA00040927.

25 Do you recognize this?

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1 A Yes.

2 Q You send in your email to Ms. Rahming just  
3 the word "okay." Correct?

4 A Yes.

5 Q And that is in response to an earlier  
6 email from Ms. Rahming to you in which she says: "I  
7 was calling because I would like an opportunity to  
8 sit on an IEP intake or exit session. If you have  
9 any coming up can you please let me know. I would  
10 only like to observe."

11 Do you see that?

12 A Yes.

13 Q Did you get back to Ms. Rahming about any  
14 IEP intake or exit sessions?

15 A I don't recall that I did. I may have but  
16 I don't remember.

17 Q Looking further down in this email thread,  
18 am I correct that you and Ms. Rahming also discussed  
19 the contents of an agenda for some sort of meeting?

20 A Yes.

21 Q Was this a GNETS directors meeting agenda  
22 you were discussing or something else?

23 A Yes, a GNETS directors.

24 Q And on Page 2 of this document Ms. Rahming  
25 says: "You can put me on the agenda for the morning

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1 of the 22nd. I will need about two and a half  
2 hours. The outline is below."

3 Do you see that?

4 A Yes.

5 Q And some of the agenda items Ms. Rahming  
6 lists include the GNETS Strategic Plan and the  
7 related self-assessment?

8 A Yes.

9 Q She also identifies collaborative support?

10 A Yes.

11 Q And there she says: "I will use this time  
12 to solicit work groups to create the resources  
13 needed for some of the strategic plan components"?

14 A Yes.

15 Q Did Ms. Rahming ultimately solicit the  
16 work groups she references here?

17 A Yes.

18 Q And what was that process like?

19 A Basically, the areas of the GNETS  
20 Strategic Plan, all the GNETS directors were placed  
21 on different committees to kind of do the research  
22 and to look to see what she had developed, if we had  
23 any input things that she needed to add or take away  
24 from.

25 Q And did she come up with the idea of

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1 creating those work groups?

2 A Yes.

3 MS. GARDNER: I'd like to have this  
4 document marked as Plaintiff's Exhibit 651.

5 (WHEREUPON, Plaintiff's Exhibit-651 was  
6 marked for identification.)

7 BY MS. GARDNER:

8 Q You've been handed what's been marked as  
9 Plaintiff's Exhibit 651. This is an email from you  
10 to Nakeba Rahming dated March 16, 2016, with the  
11 subject line: "RE: Strategic plan meeting on March  
12 17th."

13 The document is Bates-stamped GA00041055.

14 Do you recognize this?

15 A Yes.

16 Q And in this email you say: "The GNETS  
17 Executive Board and I met yesterday and we changed  
18 the old region committees to reflect the work of the  
19 new GNETS Strategic Plan. We assigned each group to  
20 a committee based on the knew strategic plan, but we  
21 don't know what your vision is for the committee  
22 work. Do you mind updating your vision for the  
23 committee work and then emailing it back to me so I  
24 can update the agenda."

25 It continues on from there. Do you see



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1 that?

2 A Yes.

3 Q You mention that the GNETS Executive Board  
4 and you met?

5 A Yes.

6 Q What is the GNETS Executive Board?

7 A Basically, we have rotating presidents or,  
8 you know, chairs of the GNETS, and I think during  
9 this period I was the GNETS chair. And so we would  
10 have a leadership team that consisted of different  
11 representatives that represented the whole entire  
12 state, and we would come together and have meetings  
13 on what we felt like the group needed PL on or  
14 additional training or additional information.

15 And so during this one we were talking  
16 about, you know, the development of the strategic  
17 plan.

18 Q Okay. How long did you serve as the, I  
19 guess, president of the GNETS Executive Board?

20 A I think it was two years.

21 Q And are you -- is there still a GNETS  
22 Executive Board currently?

23 A Sort of. I mean we don't meet as  
24 frequently, but we do have a person who's serving in  
25 that role, yes.

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1 Q Are you still on the GNETS Executive Board  
2 currently?

3 A No.

4 Q How long did you serve on the GNETS  
5 Executive Board in total, whether president or not?

6 A I think it was probably three years maybe.

7 Q Who else were the members of the GNETS  
8 Executive Board when you served?

9 A I think Stacey Benson, Greg McElwee,  
10 Kerrie Miller, Desiree Woods. I'm sure there were  
11 some people down South.

12 Steve -- I'm trying to remember Steve's  
13 last name. He was at the Coastal GNETS. So I  
14 remember his first name was Steve. He retired too,  
15 so.

16 Q Was that Steve Rains or someone else?

17 A It's a different Steve, yeah.

18 Q On this chart it also looks like it  
19 identifies some Executive Board members. Would  
20 these also have been board members you served with?

21 A I think -- let's see. Aubrey -- yes, it  
22 looks like, yes.

23 Q Was there rotation among the GNETS  
24 Executive Board?

25 A Yes.

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1 Q Did Ms. Rahming update her vision for the  
2 committee work, as you requested?

3 A When we got together she did. We talked  
4 about it and then we broke out into our groups.

5 MS. GARDNER: I'd like to mark this as  
6 Plaintiff's Exhibit 652.

7 (WHEREUPON, Plaintiff's Exhibit-652 was  
8 marked for identification.)

9 BY MS. GARDNER:

10 Q You've been handed what's been marked as  
11 Plaintiff's Exhibit 652. This is an email from you  
12 to Nakeba Rahming, dated March 30th, 2016, with the  
13 subject "March 2016 GaDOE GNETS Directors Meeting in  
14 Milledgeville."

15 This document is Bates-stamped GA00041160.  
16 Do you recognize this?

17 A Yes.

18 Q And you write to Ms. Rahming: "I sent out  
19 a Survey Monkey link this meaning to all GNETS  
20 directors asking them to sign up for at least one of  
21 the GNETS Strategic Planning Committees."

22 Do you see that?

23 A Yes.

24 Q And these are the work groups that Ms.  
25 Rahming had initially mentioned she wanted to roll

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1 out?

2 A Yes.

3 Q This then says: "Based on our  
4 conversations, here are the options they were  
5 provided," and it contains a list of committees,  
6 correct?

7 A Yes.

8 Q Section 5a, it says: "Integration of  
9 Services and Capacity Building - Exit Criteria"?

10 A Yes.

11 Q What was the aim of that committee?

12 A I think, again, just having the  
13 conversations about how to reintegrate students back  
14 into the LRE when they were ready to transition back  
15 in.

16 Q And what was the difference between that  
17 committee and then Section 5b, which says:  
18 "Integration of Services and Capacity Building -  
19 Reintegration Plan"?

20 A I think one focus was on -- and it may be  
21 a typo, too, but I think one focus was on how to  
22 actually do it with fidelity, but the other probably  
23 was based on training, the teachers that were  
24 receiving the students, but I don't recall what the  
25 difference is right now.

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1 I'm trying to see if there's any verbiage  
2 that... looks like it was just a duplication.

3 Well, it does say exit criteria and  
4 reintegration plan. But exit criteria got  
5 eliminated.

6 Q This also has a committee that's called  
7 GNETS Operation Manual?

8 A Yes.

9 Q What is GNETS Operation Manual?

10 A It was basically a guidance document that  
11 came from the DOE on how to fill out some of the  
12 reports, like you pulled up today, about the data  
13 management tool, The State Board Rule, and like how  
14 to code different things in the different meetings.

15 Q And what was the aim of this particular  
16 committee working on the GNETS operation manual?

17 A It had not been updated in a really long  
18 time, and if they were moving to the strategic plan,  
19 just to have a guidance document to know what the  
20 expectations are.

21 Q Okay. Was that document ultimately  
22 updated coming out of this committee?

23 A I don't think so, no.

24 Q And why was that?

25 A I don't recall, but I think the last

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1 operations manual I recall seeing was 2014. We just  
2 had the strategic plan in general, and then a lot of  
3 the information that used to be in the operations  
4 manual is now put on the -- I think it's the -- it's  
5 on the FTE page of the DOE website.

6 So there's a GNETS FAQ that basically has  
7 the information that used to be in the manual.

8 Q And that's an online resource?

9 A Yes.

10 Q And then there's something called the  
11 GNETS Research Committee.

12 A Yes.

13 Q What was the aim of that committee?

14 A Just to look for the research-based  
15 interventions.

16 Q Moving down into your second paragraph,  
17 you say: "We all discussed the goals, activities,  
18 possible artifacts, and resources needed under each  
19 of the sections of the strategic plan and then  
20 reported out. Here's what the group stated that we  
21 need from you."

22 Do you see that?

23 A Yes.

24 Q And when you say "here's what the group  
25 stated that we need from you," you're saying from

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1 Ms. Rahming?

2 A Yes.

3 Q And so correct that under Section 2, which  
4 is Behavior Support and Therapeutic Services, the  
5 group needed from Ms. Rahming a list of  
6 psychometrically sound social-emotional measures for  
7 the committee to review and consider?

8 A Yes.

9 Q And in that section the group also needed  
10 a list of evidenced-based social skills curricula to  
11 review and consider?

12 A Yes.

13 Q Under Section 5a, it's says the group  
14 needed "guidance on developing GNETS uniform service  
15 criteria document"?

16 A Yes.

17 Q And also that the group needed "guidance  
18 on developing a GNETS uniform exit criteria document  
19 and data gathering and reporting tool"?

20 A Yes.

21 Q And then finally, towards the bottom,  
22 under GNETS Operation Manual, it says the group  
23 needed from Ms. Rahming "guidance on your vision for  
24 the new GNETS Operation Manual"?

25 A Yes.

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1 Q And under the Research Committee, the  
2 group need from Ms. Rahming "guidance on your vision  
3 for the GNETS Research Committee"?

4 A Yes.

5 Q Did the group receive these things?

6 A Yes.

7 MS. GARDNER: I'd like to have this  
8 document marked as Plaintiff's Exhibit 653.

9 (WHEREUPON, Plaintiff's Exhibit-653 was  
10 marked for identification.)

11 BY MS. GARDNER:

12 Q You've been handed what's been marked as  
13 Plaintiff's Exhibit 653. This is an email from you  
14 to Nakeba Rahming and others, dated March 31st,  
15 2016. The subject is "RE: GNETS Strategic planning  
16 committee Sign Up."

17 This document is Bates-stamped GA00041177.  
18 Do you recognize this?

19 A Yes.

20 Q Am I correct that the others on the  
21 recipient list for this email, apart from Nakeba  
22 Rahming, are GNETS directors?

23 A Yes.

24 Q And here you are providing an update on  
25 the number of GNETS programs that have signed up for



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1 the GNETS Strategic Planning Committees?

2 A Yes.

3 Q And so this shows which GNETS directors  
4 from which programs would have been sitting on the  
5 committees that were outlined in the prior email?

6 A Yes.

7 Q Apart from your role on the GNETS  
8 Executive Committee, have you served on any other  
9 network wide committees relating to GNETS during  
10 your time as a GNETS director?

11 A That are GNETS specific or just --

12 Q Committees related specifically to GNETS.

13 A No.

14 Q Okay.

15 MS. GARDNER: I'd like to have this  
16 document marked as Plaintiff's Exhibit 654.

17 (WHEREUPON, Plaintiff's Exhibit-654 was  
18 marked for identification.)

19 BY MS. GARDNER:

20 Q You've been handed what's been marked as  
21 Plaintiff's Exhibit 654. This is an email from you  
22 to Lisa Futch, Jacqueline Neal, Samuel Clemons,  
23 Nakeba Rahming, and Vickie Cleveland, dated January  
24 14, 2018, with the subject line "Re: GNETS  
25 Reintegration Plan."

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1 The document is Bates-stamped GA00015236.

2 Do you recognize this?

3 A Yes.

4 Q Am I correct that you sent this email in  
5 response to an email from Lisa Futch, in which she  
6 says: "I have worked on the reintegration draft.  
7 You all think it is ready?"

8 A Uh-hum.

9 Q What is the reintegration draft that Ms.  
10 Futch is referring to?

11 A She created basically a draft of a  
12 resource that we can all consider using when we're  
13 ready to address a student going back into the LRE.  
14 So different components of training and to-do items  
15 to be able to make sure the students are successful.

16 Q And your response is: "I like this plan  
17 much better. My only  
18 question/concern/recommendation is that I think we  
19 need to consider adding guidance to the form as to  
20 how this is to be listed in the IEP ex. As a  
21 segment or as a supplemental services like OT or PT  
22 so we can get funding and our services be coded with  
23 the a 4 otherwise we're going to be pulling our  
24 current therapeutic staff without accounting for  
25 getting funding for these students in their new LRE

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1 if it's somewhere else."

2 Do you see that?

3 A Yes.

4 Q What does it mean for to you get funding  
5 and for your services to be coded with a four?

6 A Well, just like with traditional, all  
7 other special ed students, they have like -- you  
8 know, GNETS students are coded a four. EBD students  
9 have a code, an autism kid has a code. A student  
10 with a specific learning disability, they have a  
11 code.

12 So that when they submit the reports to  
13 the DOE, there's certain funding formulas that are  
14 tied into that specific eligibility category.

15 Q And when you say -- when you use the word  
16 "we" here, are you talking about "we" GNETS  
17 directors?

18 A I'm thinking State of Georgia all special  
19 ed. Like special ed programs in general. All the  
20 students with an IEP have a code that relates to the  
21 funding that's tied into their, their eligibility  
22 criteria. So not just GNETS.

23 Q Okay.

24 A Statewide.

25 Q So this was not about funding going to

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1 GNETS, this was just about broader special education  
2 funding?

3 A No. It was specific about GNETS funding  
4 because we are Code 4, but all other special ed  
5 categories have different codes for their students  
6 based -- so it's just like -- like I side, like an  
7 EBD student has a code, a student with specific  
8 learning disabilities has a code.

9 So my suggestion here is, is if we are  
10 still coded as a four based on the State Board Rule  
11 but if we're going to provide services out in the  
12 LRE, how are we going to be able to meet the needs  
13 of the students that are a hundred percent in GNETS  
14 program, but also be able to provide that support to  
15 students that are going into the lesser restrictive  
16 environment, because you're robbing from Peter to  
17 pay Paul. You can't do both.

18 Q So was your question here how you can make  
19 sure that students in the LRE receiving supplemental  
20 services could be coded in a way that recognized  
21 that they were receiving GNETS services so that you  
22 would get funding for that?

23 A So somebody is going to get funding. If  
24 they need the services, it has to be paid for.

25 Q Right.

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1           A     So, again, you know, the way that the  
2     GNETS funding formula is put together, it's like a  
3     combination of all these different pieces of money.  
4     And so my question related to if we're going to do  
5     this, should there be a code in the IEP that's  
6     listing these services as a supplemental services.  
7     Like OT, PT, speech, that sort of thing. Like how  
8     do we that.

9           Q     Okay.

10          A     And I was asking for, you know, do we need  
11     guidance. Is that a recommendation we need to  
12     suggest to the DOE to consider funding wise.

13          Q     And what came out of your concerns that  
14     you identify here?

15          A     Nothing.

16          Q     So this has not been addressed in any way?

17          A     No. I mean we're still coded a four, but,  
18     no, there's no additional finding.

19          Q     You also mention in the second paragraph  
20     here, you say: "I'd also like to request at our  
21     next meeting that Lisa and the other persons leading  
22     the charge developing all of our new common forms  
23     present them to us at the meeting so they can get  
24     everyone's feedback collaboratively when we're all  
25     together."

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1 A Yes.

2 Q Do you see that?

3 A Yes.

4 Q What were the new common forms that you  
5 were referring to?

6 A Well, just like each of the committees  
7 were working on like the reintegration plan, or a  
8 request for services plan, the goal of the DOE was  
9 for us to have common referral packages or requests  
10 for services throughout the State of Georgia if that  
11 was possible.

12 Q Okay.

13 A And so the different committees were  
14 developing those to present to the rest of the  
15 network to see if we had any feedback or comments.

16 Q Okay.

17 MS. GARDNER: I'd like to have this marked  
18 as Plaintiff's Exhibit 655.

19 (WHEREUPON, Plaintiff's Exhibit-655 was  
20 marked for identification.)

21 BY MS. GARDNER:

22 Q You've been handed what's been marked as  
23 Plaintiff's Exhibit 655. This is an email from you  
24 to Nakeba Rahming, Vickie Cleveland, and Pat Wolf,  
25 dated January 31st, 2018, with the subject line "RE:

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1 Consideration of Services Pilot."

2 This contains one attachment that is a pdf  
3 with a file name FY18 Winter GNETS LEA collaborative  
4 ppt Final 12-8-2017."

5 A Uh-hum. (Affirmative.)

6 Q The Bates-stamp on this document is  
7 GA00015983.

8 Do you recognize this?

9 A Yes.

10 Q And you write and you say: "I'm emailing  
11 you because I just reviewed the GNETS Consideration  
12 of Services Packet with my School Psychologists and  
13 district leaders team. We found a few areas that  
14 conflict with the new GNETS State Board Rule."

15 Do you see that?

16 A Yes.

17 Q And is this GNETS Consideration of  
18 Services Packet the packet that you discussed  
19 earlier that districts fill out when they're  
20 considering referring a student for GNETS services?

21 A I think so. I'm trying to see if it's  
22 listed in the packet.

23 Yes, it is.

24 Q Was the GNETS consideration of services  
25 packet one of the new common forms that you

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1 referenced in the email that we looked at most  
2 recently?

3 A Yes.

4 Q What prompted you to flag that you found a  
5 few areas that conflict with the new GNETS State  
6 Board Rule?

7 A Well, I try to be thorough, and so if I  
8 see something that is unclear to me, I want to get  
9 clarification.

10 So it looks like here -- it says  
11 reevaluation timeline one year versus three years.

12 And so which is it? Was it supposed to be  
13 for a GNETS kid, every three years do they get a  
14 comprehensive one or one year.

15 So in an area with some of the information  
16 they send out there were two conflicting pieces of  
17 information that I just wanted to get clarity.

18 Q Did you understand that the Consideration  
19 of Services Packet was supposed to align with the  
20 GNETS State Board Rule?

21 A Yes.

22 MS. GARDNER: I'd like to have this marked  
23 as Plaintiff's Exhibit 656.

24 (WHEREUPON, Plaintiff's Exhibit-656 was  
25 marked for identification.)



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1 BY MS. GARDNER:

2 Q You've been handed what has been marked  
3 Plaintiff's Exhibit 656. This is an email from you  
4 to Nakeba Rahming, dated October 27, 2017?

5 A Uh-hum. (Affirmative.)

6 Q With the subject: "FW: Reintegration  
7 committee meeting."

8 And it contains two attachments, the first  
9 of which is a document titled "North Metro GNETS  
10 Consideration for Services\_Revised\_July 2017," and  
11 the second of which is titled "North Metro GNETS  
12 Reintegration Plan\_July 2017."

13 The Bates-stamp on this document is  
14 GA00132302.

15 Do you recognize this?

16 A Yes.

17 Q And you write in this email: "Nakeba,  
18 Good morning. Although I like the new GNETS  
19 consideration of services forms, I like the ones my  
20 team and I developed for my program this summer as  
21 well. Are we going to be allowed to use our own new  
22 forms or do we all need to use the same forms?"

23 Do you see that?

24 A Yes.

25 Q And then you attach your revised forms for

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1 Ms. Rahming's review and consideration, correct?

2 A Yes.

3 Q So you are aware that consideration of  
4 services forms have been developed for common use  
5 across GNETS programs?

6 A Yes.

7 Q And here you are asking Ms. Rahming  
8 whether North Metro would be allowed to use  
9 consideration of services forms that differed from  
10 those common GNETS consideration of services forms?

11 A Yes.

12 Q Did you receive a response from Ms.  
13 Rahming?

14 A Yes.

15 Q What was her response?

16 A She said they were fine. They took a lot  
17 of the information off my forms for the statewide  
18 forms.

19 Q Okay. And what was -- you also attach  
20 your reintegration plan. What was the purpose for  
21 your attaching that?

22 A Just to show her what we had worked on. I  
23 mean we had been working on the committees, and  
24 sometimes it takes a long time to get information  
25 back.

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1                   So we wanted to make sure that we were  
2                   able to move forward with the expectations of the  
3                   strategic plan based on The State Board Rule.

4           Q       What is North Metro GNETS' current fiscal  
5                   year operating budget?

6           A       I want to say it's probably around \$6  
7                   million.

8           Q       Okay. And what was the budget for the  
9                   2021-22 fiscal year, approximately?

10          A       It's about the same. It goes down every  
11                   year by a couple hundred thousand, but it's in that  
12                   same range. Five to six.

13          Q       And where do the funds that make up the  
14                   North Metro GNETS operating budget come from?

15          A       The State.

16          Q       Any --

17          A       Federal and state dollars. I'm sorry.

18          Q       I'm sorry?

19          A       Federal and state dollars.

20          Q       Okay. Is the majority of the budget state  
21                   dollars?

22          A       No.

23          Q       It's not?

24          A       No. The majority is federal.

25          Q       The majority is federal?

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1           A       Wait, let me -- no. It's majority state.  
2       Sorry. I'm getting tired. Sorry.

3           Q       Okay. You mentioned earlier, I believe,  
4       that there is a formula used to determine the level  
5       of funding that GNETS programs get?

6           A       Yes.

7           Q       How does that funding formula work?

8           A       To the best of my knowledge, it's very  
9       convoluted, but what I've been told is that there is  
10      a pot of money that's kind of left over money that  
11      the Governor has based on whatever pot, and then  
12      based on the number of students that you serve,  
13      there's a kind of a proportionate number that varies  
14      from year to year that is allotted for each student  
15      that you serve, but it's on a three-year rolling  
16      average.

17          Q       So your funding for North Metro GNETS  
18      would be influenced by the enrollment at North Metro  
19      GNETS for the last three years?

20          A       Yes.

21          Q       What is T&E?

22          A       Training and experience.

23          Q       And how does that factor into the funding  
24      that GNETS programs receive?

25          A       So based on the years of experience that

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1 an employee has and their degree level, they get --  
2 so a Ph.D. level employee gets more money than a  
3 bachelor's level, to pay their salary.

4 Q Does a level experience for an employee  
5 that you've employed in the past in any way limit or  
6 cap the amount of money you can receive for that  
7 position moving forward?

8 A Yes.

9 Q And how does that work?

10 A Well, we pay everyone based on the State's  
11 salary schedule, but then there's a supplement  
12 that's added to that amount.

13 Q And when you say that the level of  
14 experience for an employee that you've employed in  
15 the past limits or caps the amount of money you can  
16 receive for that position moving forward, how does  
17 -- can you just explain that?

18 A There's a salary schedule, and so the DOE  
19 puts out a state salary schedule each year. So  
20 there's a base salary for every position and title,  
21 and then the training and experience is an extra  
22 supplement that the fiscal agent pays on top of that  
23 based on your degree level and your years of  
24 experience.

25 So the higher your education level, the

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1 more years of experience, you get more money for  
2 that. But it typically caps out at 20 years of  
3 experience, unless there's some kind of cost of  
4 living raise.

5 Q Okay. But if you employed a teacher one  
6 year who had three years of experience and then that  
7 position was vacated and the following year you  
8 wanted to employ a teacher that had 20 years of  
9 experience, would you have any trouble paying the  
10 teacher with 20 years of experience the T&E?

11 A I would be able to pay the teacher but  
12 that money would have to come out of some other line  
13 item in my budget.

14 Q Okay. Is that something that you take  
15 into consideration when you're filling positions?

16 A Yes.

17 Q And what kind of impact does that have on  
18 your staffing?

19 A Well, staffing is most important. I mean  
20 more than 80 percent of my budget, it goes towards  
21 staffing, but I want the best and the brightest and  
22 that have the right temperament to work with our  
23 students. So if it means I have to be short  
24 somewhere else, like buying new equipment or other  
25 supplies, I would prefer having a trained and

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1 experienced person over flashy, new items for the  
2 teachers.

3 Q Are you familiar with Amber McCullum?

4 A Yes.

5 Q Who is Amber McCullum?

6 A She's a budge person at the DOE.

7 I'm sorry.

8 Q What is her role with respect -- well, let  
9 me reframe that.

10 Does she play any role with respect to  
11 funding for GNETS programs?

12 A Yes. I think she's the lead person at the  
13 DOE level. Once the governor approves the budget, I  
14 think she assists with the allocations that go out  
15 to each of the GNETS programs.

16 Q Are you familiar with Jeronald Bell?

17 A Geronimo?

18 Q Jeronald.

19 A Yes, I'm sorry. Yes.

20 MS. GARDNER: I'd like to mark this as  
21 Plaintiff's Exhibit 657.

22 (WHEREUPON, Plaintiff's Exhibit-657 was  
23 marked for identification.)

24 BY MS. GARDNER:

25 Q You've been handed what's been marked as

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1 Plaintiff's Exhibit 657.

2 This is an email from you to Zelphine  
3 Smith-Dixon and Vickie Cleveland, with copies to  
4 Leigh Ann Putman and Blake McGaha.

5 The subject is "FW: FY21 Preliminary  
6 GNETS State and Federal Grant Allocations."

7 A Uh-hum. (Affirmative.)

8 Q This document contains three attachments,  
9 and the first page is Bates-stamped GA02326483.

10 Do you recognize this?

11 A Yes.

12 Q Am I correct that the first of the  
13 attachments to this email is the FY21 Preliminary  
14 GNETS State and Federal Grant Allocations memo?

15 A Yes.

16 Q And that's from Zelphine Smith-Dixon to  
17 the GNETS fiscal agents?

18 A Yes.

19 Q And then the second attachment is the  
20 preliminary FY21 GNETS State and Federal Grant  
21 Allocations?

22 A Yes.

23 Q I want to just look at that very quickly.  
24 This is on the page Bates-stamped GA02326486.

25 Do you see the line for North Metro?



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1 A Yes.

2 Q And does this -- am I correct the FY21  
3 GNETS recommended state allocation was approximately  
4 \$5.25 million?

5 A Yes.

6 Q And 415,000 of that was the FY21 GNETS  
7 recommended federal allocation?

8 A Yes.

9 Q And then 5.67 million --

10 A Correct.

11 Q Sorry. No. 5. --

12 A 670,868.

13 Q I need to start over. I think I messed  
14 this up.

15 So the total FY21 GNETS recommended  
16 allocation for North Metro was 5.67 million. Is  
17 that correct?

18 A Yes.

19 Q 415,000 of that was the FY21 GNETS  
20 recommended federal allocation?

21 A Yes.

22 Q And then 5.25 million was the FY21 GNETS  
23 recommended state allocation?

24 A Yes.

25 Q I just wanted to clarify that the majority

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1 of North Metro's budget does come from the GNETS  
2 state grant, right?

3 A Correct.

4 MS. GARDNER: I'd like to mark this as  
5 Plaintiff's Exhibit 658.

6 (WHEREUPON, Plaintiff's Exhibit-658 was  
7 marked for identification.)

8 BY MS. GARDNER:

9 Q You've been handed what's been marked as  
10 Plaintiff's Exhibit 658. This is an email from you  
11 to Nakeba Rahming with a copy to Stacey Benson,  
12 Steve Rains, and Desiree Woods, and it bears the  
13 subject "Re: GNETS Draft Funding Formula."

14 A Uh-hum.

15 Q The document is Bates-stamped GA00784542.  
16 Do you recognize this?

17 A Yes.

18 Q And am I correct in this email you're  
19 confirming that you are going to attend a meeting to  
20 discuss a draft funding formula for GNETS?

21 A Yes.

22 Q In the email from Ms. Rahming discussing  
23 this meeting she says that the meeting will be with  
24 Denise Peterson, and then she goes on to say:

25 "Denise will share how she and Debbie came up with

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1 the formula and listen to alternative options so  
2 that we can begin the process for getting it to OPB  
3 and approved for the FY10 fiscal year."

4 A Yes.

5 Q What is OPB?

6 A Office of Planning and Budget.

7 Q And how is that relevant in the GNETS  
8 funding process?

9 A It comes -- I think it's the part of the  
10 Governor's Office of accountability, where the  
11 actual -- after the Governor approves the budgets,  
12 OPB works to distribute it to the different state  
13 agencies.

14 Q And when -- well, first of all, did you  
15 actually attend this meeting that's referenced here?

16 A Yes.

17 Q And what was the nature of the discussion?

18 A Looking at some different ways to consider  
19 funding GNETS. And so they were starting a  
20 committee to just hear what some of the ideas were  
21 and some of the thoughts, because I think it's been  
22 -- I know it's been over -- it seems like it's been  
23 over 30 years, if not 40 years, since the funding  
24 formula for GNETS has actually been looked at.

25 Q And was there some goal in thinking about

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1 alternative formulas for GNETS?

2 A Yes.

3 Q What was that?

4 A The goal was to see how we could maximize  
5 funding because, again, the more students that we  
6 receive have more mental health issues than ever  
7 before and so providing behavioral supports in the  
8 classroom has become a lot more challenging.

9 So the more clinically and specialized  
10 psychiatric supports we need, we can't -- we're not  
11 able to provide that level of support.

12 Q Are you aware of a recent -- recent news,  
13 and I believe this was last spring, about a  
14 potential change in the way that GNETS programs  
15 might be funded?

16 A Yes.

17 Q What's your understanding of what that  
18 proposed change was?

19 A Is that the proposal -- my understanding  
20 is that it may not be grant funded anymore, that it  
21 may change over to a QBE funding formula, and that  
22 we were going to have some update in November as to  
23 what that might look like.

24 Q And what would it mean for funding to move  
25 from a grant formula to a QBE formula?

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1           A       It depends on whether the -- the current  
2       QBE funding formula, the way that it's currently set  
3       up is at a lower rate than it is for GNETS right  
4       now. So it would mean reduce services rather than  
5       appropriate services or more services, right now,  
6       unless they really look at revising how that funding  
7       formula is looked at.

8                       So an even swap would not be an even swap.

9           Q       So your expectation is that moving from a  
10       state grant formula to a QBE formula would result in  
11       GNETS programs losing money?

12          A       Yeah, money -- equal services, yes.

13                       And right now we need more services.

14                       MS. GARDNER: I would like to have this  
15       document marked as Plaintiff's Exhibit 659.

16                       (WHEREUPON, Plaintiff's Exhibit-659 was  
17       marked for identification.)

18       BY MS. GARDNER:

19          Q       You've been handed what's been marked as  
20       Plaintiff's Exhibit 659. This is an email thread  
21       between you and Vickie Cleveland and Lakesha  
22       Stevenson, from June 2019, regarding GNETS Continuum  
23       of Services, Student Level Record & Funding.

24          A       Uh-hum. (Affirmative.)

25          Q       This document is Bates-stamped GA00347596.

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1 Do you recognize this?

2 A Yes.

3 Q I want to start at the bottom of this  
4 email thread, which is the first in time email. So  
5 direct your attention to the second-to-last page.

6 This is your email to Vickie and Lakesha  
7 on June 6, 2019?

8 A Uh-hum. (Affirmative.)

9 Q In that email, Ms. -- the third sentence  
10 in, you say: "As you know, it's the end of the year  
11 and I'm in the process of making sure that all of my  
12 NM GNETS students appear on each of my respective  
13 district's student level record reports prior to our  
14 superintendent signing off so we will receive the  
15 correct amount of funding. I'm emailing you now  
16 because I inquired about one of my missing students  
17 on one of my district's student level record  
18 reports. We've been providing consultative services  
19 for this student and I was told since we only  
20 provide 2 hours of consultative services to the  
21 student a month, he will not be coded 4 and we will  
22 not receive funding for him. Will you please let me  
23 know how many hours a month of GNETS consultative  
24 supports earn funding?"

25 A Uh-hum. (Affirmative.)

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1 Q Is this another example of the funding  
2 concern that we discussed earlier with GNETS sort of  
3 difficulty with providing services in general  
4 education environments because of the lack of  
5 receiving funding for that?

6 A Yes.

7 Q Moving down, you say, and this is the  
8 sentence that begins with "However."

9 You say: "As we continue to provide more  
10 intensive therapeutic support services, we have more  
11 students returning to their LRE which is amazing and  
12 is what we want to do. However, our enrollment  
13 drops and the most significantly mentally ill and  
14 behaviorally challenged students remain, while our  
15 budgets continue to shrink as we help students  
16 transition to their new LRE."

17 A Uh-hum. (Affirmative.)

18 Q This was an effect that you had been  
19 seeing at the North Metro GNETS program?

20 A Yes.

21 Q And that's about your funding is tied to  
22 enrollment?

23 A It's tied to enrollment, but the students,  
24 as we do a better job providing therapeutic  
25 supports, our numbers shrink, but the mental health

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1 issues of the students that remain are greater. So  
2 numbers don't equate to the individual needs that  
3 the students have. And that's currently the way I  
4 perceive that the budget is set up.

5 Q Ms. Cleveland responded to your email on  
6 June 7, 2019, right?

7 A Yes.

8 Q And looking towards the bottom of her  
9 response, where she says, "The GNETS continuation of  
10 services flow chart."

11 A Yes.

12 Q She says: "The GNETS continuation of  
13 services flow chart provides guidance on consult  
14 services. There is a request for consultation form  
15 in the packet. NM should follow this protocol.  
16 Several our sites have their current staff provide  
17 support for students that are reintegrating or they  
18 provide observations that are needed.

19 "NM has several support staff and the team  
20 may need to take a look at how these staff might  
21 better provide consult services. We do have  
22 programs that are providing these service with less  
23 staff. Consult services are mostly support for  
24 teachers, not direct supports to students from my  
25 observations."



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1                   What did you understand Ms. Cleveland to  
2                   be saying to you?

3           A       To figure it out. I mean basically. I  
4           just felt like, you know, she was just saying I  
5           needed to look to see how I could use the new GNETS  
6           funding State Board Rule to provide those services  
7           with the current staff that I have, which is pulling  
8           from the staff that I have with the most mental  
9           health needs.

10                   So, again, from my perspective, you're  
11           robbing Peter to pay Paul. If you have the most  
12           significant kids in the program because of their  
13           mental health and behavioral challenges, but then  
14           we're also wanting to provide those services to the  
15           kids in the LRE so we won't have recidivism, them  
16           coming back and getting those teachers trained, you  
17           can't to both with the same person effectively.

18           Q       And to be clear, here you were talking  
19           about providing direct services to students in the  
20           LRE?

21           A       Yes. So it was a combination of providing  
22           direct services to the students and also the staff  
23           because we're not going to be there, we being GNETS,  
24           can't be in more than one place. But if the child  
25           is going to be successful in the LRE, we need to

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1 equip the teachers with the skill set that we have  
2 where the child was successful.

3 So it's kind of a balance in training the  
4 student but also training the teachers as well to  
5 support them.

6 Q And you said the concerns that you raised  
7 in prior emails and in this one have not been  
8 addressed to your satisfaction?

9 A No.

10 MS. GARDNER: I'm going to ask that this  
11 document be marked as Plaintiff's Exhibit 660.

12 (WHEREUPON, Plaintiff's Exhibit-660 was  
13 marked for identification.)

14 BY MS. GARDNER:

15 Q You have been handed what's been marked as  
16 Plaintiff's Exhibit 660. This is an email from you  
17 to Nakeba Rahming and Vickie Cleveland, dated  
18 February 14, 2018, with the subject: "FW:  
19 Independence High School Location."

20 This is Bates-stamped GA00201024.

21 Do you recognize this?

22 A Yes.

23 Q In this email you say to Ms. Cleveland and  
24 Ms. Rahming: "I want to keep in the loop regarding  
25 the facilities complaints I've been receiving our

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1 new North Metro GNETS Fulton Independence High  
2 School location."

3 A Yes.

4 Q What prompted you to share this  
5 information with Ms. Rahming and Ms. Cleveland?

6 A Well, as part of the GNETS Strategic Plan,  
7 one of the sections on there is Facilities, and so  
8 we were starting to get many complaints from some of  
9 our parents just saying that the facility, even  
10 though it was renovated, the kids did not have  
11 access to some the other things that the traditional  
12 students had access to.

13 Q And this email that you sent to Ms.  
14 Cleveland and Ms. Rahming, you forward to them  
15 correspondence between yourself and Robert Abernathy  
16 and Samad Knight?

17 A Yes.

18 Q And who is Robert Abernathy?

19 A He's a GNETS LEA -- liaison coordinator  
20 that's a Fulton County employee.

21 Q Okay. And so am I correct that Mr.  
22 Abernathy went out to the GNETS location at  
23 Independence High School to look at some of the  
24 things that complaints have been received about?

25 A Yes.

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1 Q And so this correspondence outlines some  
2 of those concerns and then some of Mr. Abernathy's  
3 thoughts about how to go about addressing some of  
4 them?

5 A Yes.

6 Q I want to just look at a couple of the  
7 concerns, which show up on the second page.

8 One of those was -- it says that the  
9 buzzer rings at both the Independence High School  
10 door and the GNETS door regardless of which door  
11 needs to be answered?

12 A Yes.

13 Q GNETS had a door at Independence that was  
14 separate from the regular Independence High School  
15 door?

16 A Yes. They divided the building because it  
17 was an alternative school on one side and the GNETS  
18 program on the other side.

19 Q So Independence High School itself is an  
20 alternative school?

21 A It was. They have now closed it. So  
22 we're no longer in that building.

23 Q Okay. This also says the home living room  
24 dishwasher and sink disposal weren't hooked up?

25 A Correct.

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1 Q Is it fair to say those couldn't be used  
2 as part of home living without being hooked up?

3 A That's fair.

4 Q And this also says that "GNETS lunch is at  
5 12:30 after Independence High School students go -  
6 often there is only pizza left - parents are upset  
7 about GNETS students not having a food choice"?

8 A Correct.

9 Q Further down it says, and this is in the  
10 second paragraph from the bottom, that "students  
11 have to walk outside of the building to go to  
12 lunch/breakfast via side door"?

13 A Yes.

14 Q Why was that?

15 A When they renovated the building and --  
16 the classrooms for GNETS were not connected. So  
17 they then built like an overpass. So when the kids,  
18 if there's increment weather, they could actually  
19 walk out of the building and go in and get lunch.  
20 But it wasn't there initially.

21 Q And there's no interior path for GNETS  
22 students to travel to a lunchroom?

23 A No. But, again, they've closed the  
24 building now. We're no longer there.

25 Q In the email that you send to Mr.

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1     Abernathy you provide some comments and responses to  
2     the concerns, and then Mr. Abernathy is -- sort of  
3     thoughts about how to address that; is that right?

4             A     Correct.

5             Q     One of the things you say, and this is  
6     about midway down in your email to Mr. Abernathy, it  
7     says: "When IEP meetings are being held, OT  
8     services, Speech services, and Therapeutic groups  
9     are supposed to be provided. We don't have any  
10    space to sufficiently provide these services. The  
11    GNETS staff has asked to reserve space in the Museum  
12    and they are told no. It would be a great help if  
13    you all could assist us with them unlocking the door  
14    on the GNETS side with the stairs that lead up to  
15    the Museum for us to have easy access to the museum  
16    and you all assist us with getting them to allow us  
17    to reserve rooms on an ongoing basis so we can  
18    provide these students these services."

19                Do you see that?

20             A     Yes.

21             Q     What is the museum?

22             A     The building where Independence --  
23     Independence used to be in a totally separate  
24     building, and then they -- Fulton County Schools,  
25     they turned it into a STEM school, I think. And so

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1 they put the programs that were in the old building  
2 that they were tearing down and rebuilding, they put  
3 us in a renovated building that was connected to an  
4 historic museum in Fulton County. So we were on the  
5 backside of the museum.

6 Q So I take it from your email that GNETS  
7 had asked to use space in the museum because the  
8 GNETS program didn't have adequate space in their  
9 part of the Independence High School location to  
10 provide therapeutic services?

11 A Correct.

12 Q And Independence High School told GNETS  
13 they could not use the museum space?

14 A Yes.

15 Q Do general education facilities where  
16 North Metro GNETS houses classrooms have the final  
17 say in what parts of the building North Metro GNETS  
18 can use?

19 A Well, the buildings are owned by the LEAs,  
20 not by GNETS. And so whenever we have a facilities  
21 issue, I have to bring it up to the district  
22 themselves. So we don't own any of the buildings.  
23 So I have to collaborate with them to get it  
24 resolved.

25 Q And so you said that there is no longer a

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1 North Metro GNETS site at Independence High School?

2 A Correct.

3 Q Is that how this issue was resolved, was  
4 just that you moved out of the space?

5 A Yes.

6 Q And how, how soon after this February 2018  
7 correspondence did you move out of that space?

8 A It was probably at the end of the school  
9 year.

10 MS. GARDNER: I'm going to ask that this  
11 be marked as Plaintiff's Exhibit 661.

12 (WHEREUPON, Plaintiff's Exhibit-661 was  
13 marked for identification.)

14 BY MS. GARDNER:

15 Q You've been handed what's been marked as  
16 Plaintiff's Exhibit 661. This is an email from you  
17 to Vickie Cleveland, dated April 12th, 2018, with  
18 the subject "Re: Independence High School - Fulton  
19 County."

20 This document is Bates-stamped GA00319313.

21 And in your email you say: "Thanks for  
22 the update," correct?

23 A Yes.

24 Q And that's responding to an email thread  
25 that Ms. Cleveland forwarded to you earlier the same



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1 day with an FYI?

2 A Yes.

3 Q The forwarded email is from Pat Schofill  
4 to Vickie Cleveland and Nakeba Rahming, right?

5 A Yes.

6 Q And in that email Pat Schofill says:  
7 "Nakeba, Mike spoke with the Facility Director from  
8 Fulton County today. Our concerns were expressed  
9 and we asked him to provide us with a response. I  
10 expect to receive this in the next few days."

11 Do you see that?

12 A Yes.

13 Q And earlier in the thread am I correct  
14 that Vickie Cleveland sent an email to Pat Schofill  
15 in which she summarizes what she says "our  
16 observations at the GNETS facility Independence High  
17 School in Fulton County"?

18 A Yes.

19 Q So at some point, I take it, Ms. Cleveland  
20 came out to actually tour Independence High School?

21 A She did.

22 Q And was that because of the volume of  
23 complaints that were being lodged about the  
24 facility?

25 A Yes.

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1 Q Did she come alone, or was she accompanied  
2 by Ms. Rahming?

3 A I think Ms. Rahming came, too, I think. I  
4 can't remember specifically but I think they both  
5 were there.

6 Q And this list of issues outlines some that  
7 I don't believe appeared before. For example, this  
8 says there's no hot running water?

9 A Uh-hum. (Affirmative.)

10 Q It also says there's no access to water  
11 fountains?

12 A Correct.

13 Q And that there's one bathroom for 17  
14 students?

15 A Correct.

16 Q This identifies concerns regarding  
17 inequality when comparing alternative schools to  
18 GNETS space. Do you see that?

19 A Yes.

20 Q What were those concerns?

21 A When we went to tour the building, the  
22 side of the building where the alternative school  
23 was housed, we asked to be placed in part of that  
24 building, but when the final facilities decision was  
25 made, we were not in that part of the building.

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1 Q And was that part of the building superior  
2 in terms of its -- the quality of the facilities?

3 A The facility had been renovated but it was  
4 access to like appropriate bathrooms, water  
5 fountains, sensory rooms. So that sort of thing.

6 Q Okay.

7 MS. GARDNER: I'd like to have this marked  
8 as Plaintiff's Exhibit 662.

9 (WHEREUPON, Plaintiff's Exhibit-662 was  
10 marked for identification.)

11 BY MS. GARDNER:

12 Q You have been handed what's been marked as  
13 Plaintiff's Exhibit 662. This is an email from you  
14 to Vickie Cleveland, dated December 11, 2019.

15 The Bates-stamp on this document is  
16 GA00356478.

17 Do you recognize this?

18 A Yes.

19 Q In this email you are forwarding  
20 correspondence to Ms. Cleveland regarding teacher  
21 vacancies at the Independence High School location  
22 of the North Metro GNETS program?

23 A Yes.

24 Q So I take it this is December 2019, that  
25 the Independence High School location was still

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1 open?

2 A Yes.

3 Q And the prior correspondence that we  
4 looked at was from the spring of 2018, correct?

5 A Yes. So it ended, I think, after the end  
6 of this year.

7 We were there for a couple of years before  
8 they closed the building and moved us over to  
9 Centennial.

10 Q So the end of this year, for Plaintiff's  
11 Exhibit 662, would have been the spring of 2020,  
12 correct?

13 A I think so, yes.

14 Q Okay. This correspondence that you  
15 forward to Ms. Cleveland includes a letter that a  
16 parent submitted to a state senator about the  
17 situation at Independence High School?

18 A Yes.

19 Q And that parent was concerned that there  
20 were three teacher vacancies at Independence High  
21 School at that time?

22 A Yes.

23 Q Those vacancies had existed since the  
24 summer of 2019?

25 A I don't recall.

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1 Q Okay. The parent says that the students  
2 at Independence High School and North Metro GNETS  
3 program were all being served by a temporary  
4 substitute. Is that right?

5 A Yes.

6 Q Were there any paraprofessionals --

7 A Yes.

8 Q -- at that time at Independence High  
9 School?

10 A Yes.

11 Q How many?

12 A I don't recall, but because there were  
13 some students that had categoricals, which is a  
14 one-on-one. But every classroom did have a para, at  
15 least one.

16 Q What happened after you received this  
17 email and letter?

18 A We continued to recruit for teachers.  
19 Fulton County and also North Metro.

20 Q Was North Metro able to address the  
21 vacancies that the parent was complaining of?

22 A Eventually.

23 Q During the 2019-2020 school year?

24 A I don't recall. I'd have to look at the  
25 list.

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1 Q And what prompted you to send this to Ms.  
2 Cleveland?

3 A I just wanted to keep her aware of the  
4 issues that were being addressed regarding  
5 facilities and also the staffing shortages. It was  
6 a critical teacher shortage everywhere and it's been  
7 going on for a while.

8 Q Does North Metro GNETS program currently  
9 have a site at Long Middle School?

10 A Yes.

11 Q Is that a site that North Metro moved from  
12 another facility?

13 A Yes. So all of the transition schools in  
14 Atlanta used to be South Metro.

15 Q Uh-hum.

16 A And then we acquired them when Atlanta  
17 wanted North Metro to be the only GNETS program.

18 MS. GARDNER: I'd like to mark this as  
19 Plaintiff's Exhibit 663.

20 (WHEREUPON, Plaintiff's Exhibit-663 was  
21 marked for identification.)

22 BY MS. GARDNER:

23 Q You've been handed what's been marked as  
24 Plaintiff's Exhibit 663. This is an email thread  
25 between you and Troy Keller, Vickie Cleveland, and

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1 Katika Lovett, among others, from May 2018,  
2 regarding the GNETS classroom at Long Middle School.

3 This document is Bates-stamped GA00322900.

4 Do you recognize this?

5 A Yes.

6 Q I want to start at the bottom of this  
7 email thread, which is the first-in-time email.

8 Do you see the May 22nd, 2018 email from  
9 Michael Rowland to Vickie Cleveland with copies to  
10 Pat Schofill?

11 A Yes.

12 Q Doug Suits and Anthony Cook?

13 A Yes.

14 Q And in that email Mr. Rowland says: "As a  
15 follow up to my previous email regarding the request  
16 by APS to relocate a GNETS class at Long Middle  
17 School Facility, this facility is currently included  
18 in the local facility plan for APS and is eligible  
19 to receive state capital outlay funds for  
20 renovations and modifications. Due to the fact that  
21 two buildings at this facility are listed as first  
22 occupied in 1959, our field consultant who serves  
23 APS conducted a site visit at this location to view  
24 the proposed classroom to be used for GNETS  
25 students."

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1 Do you see that?

2 A Yes.

3 Q And then he goes on to say: "Absent any  
4 specific program concerns identified by your office,  
5 the Facility Services Unit considers this space  
6 appropriate for its intended use."

7 Do you see that?

8 A Yes.

9 Q So correct that before North Metro GNETS  
10 was able to move a classroom to Long Middle School  
11 that that needed to be -- the facility needed to be  
12 assessed by the Georgia Department of Education  
13 Facilities Unit?

14 A Correct.

15 Q Did Ms. Cleveland also come to view the  
16 facility prior to the classroom being relocated to  
17 Long Middle School?

18 A Yes.

19 Q And so once both the Facilities Unit and  
20 Ms. Cleveland had signed off, then North Metro GNETS  
21 program was able to move that classroom to Long  
22 Middle School?

23 A Yes.

24 MS. GARDNER: What's the time on the  
25 record?



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1 THE VIDEOGRAPHER: We're at 6:16. So you  
2 have about 44 minutes left.

3 MS. GARDNER: Okay. I think I'd like to  
4 take about a ten-minute break and then we'll  
5 come back and finish.

6 THE VIDEOGRAPHER: The time is 1:16 --  
7 excuse me.

8 The time is 4:52 p.m. and we are off the  
9 record.

10 (A recess was taken.)

11 THE VIDEOGRAPHER: The time is 5:04 p.m.,  
12 and we are on the record.

13 BY MS. GARDNER:

14 Q You have been the director at the North  
15 Metro GNETS program for 10 years or so, correct?

16 A Yes.

17 Q What is the shortest length of stay for a  
18 student at North Metro GNETS that you're familiar  
19 with based on your experience?

20 A I have to think. I can't think of a  
21 specific student offhand, but I to know that it's  
22 based on progress and goals, but we have had  
23 students to not stay an entire year.

24 Q So less than a year?

25 A Less than a year.

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1 Q And what's the longest length of stay for  
2 a North Metro GNETS student that you can recall  
3 based on your experience?

4 A I mean it's all based on the IEP team  
5 decision, but it varies based on the severity of  
6 each student.

7 Q Are there any students who are in North  
8 Metro GNETS when you assumed the role of director  
9 who are still in North Metro GNETS?

10 A Not that I'm aware of, no.

11 Q Are there any markers or timelines within  
12 North Metro GNETS after which a student has been in  
13 the program for a particular length of time where  
14 there's any more extensive evaluation or assessment  
15 that occurs to kind of consider, you know, what's  
16 happening with the student, whether the student  
17 needs to continue in kind of a more restrictive  
18 environment like North Metro GNETS?

19 A Yes.

20 Q What are those markers or timelines?

21 A Typically, when we see that the behavioral  
22 and therapeutic interventions we are administering  
23 aren't successful. There are some kids that have  
24 that critical of a need that the IEP team will meet  
25 and determine that we need to consider more

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1 restrictive services.

2 Q And so I guess just to make sure that my  
3 question is clear, I'm asking about whether there's  
4 any sort of trigger point, like, for example, if a  
5 student was in North Metro GNETS for six years, is  
6 there any sort of --

7 A Oh, a timeline.

8 Q -- time period after which you start to  
9 say, okay, this needs to be looked at more closely  
10 to figure out what's happening and why the length of  
11 stay is so long? Is what I'm saying.

12 A So, no, there's nothing that I'm aware of  
13 that is tied to a timeline. It's more of success,  
14 of lessening those really severe behaviors. But not  
15 a timeline that is required or -- no.

16 Q Okay.

17 MS. GARDNER: So I would like to have this  
18 document marked as Plaintiff's Exhibit 664.

19 (WHEREUPON, Plaintiff's Exhibit-664 was  
20 marked for identification.)

21 BY MS. GARDNER:

22 Q You've been handed what's been marked as  
23 Plaintiff's Exhibit 664. This is the first tab of  
24 an Excel file provided by North Metro GNETS to the  
25 United States in response to a document subpoena?

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1 A Yes.

2 Q Do you recognize this?

3 A Yes.

4 Q Did you prepare this chart?

5 A Yes.

6 Q And was the Excel file this chart was  
7 included on submitted to the United States in  
8 response to a subpoena?

9 A Yes.

10 Q Am I correct that this -- or these charts  
11 show the total enrollment in North Metro GNETS  
12 across all of the school districts served as of  
13 August 31st, 2021?

14 A Yes.

15 Q And so as of that date you had 242  
16 students --

17 A Yes.

18 Q -- served?

19 Just so that I'm correct in understanding,  
20 do you see in the left-hand column it says four  
21 students with autism served in class?

22 A Yes.

23 Q And then the total there is 59?

24 A Yes.

25 Q Does the 242 program total include the 59,

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1 or the 59 in addition to that?

2 A It includes the 2 -- 59.

3 Q And this chart shows that as of August  
4 31st, 2021, North Metro GNETS had served 48  
5 elementary school students?

6 A Looking for that.

7 Q It's on the chart on the left, and it  
8 breaks it down by --

9 A Yes.

10 Q So 48 elementary school students?

11 A Yes.

12 Q And that included three first graders,  
13 which appears on the right-hand chart?

14 A Yes.

15 Q Two second graders?

16 A Yes.

17 Q Five third graders?

18 A Yes.

19 Q And of all the students served as of this  
20 August 31st, 2021 date, it says that three were  
21 served less than 10 days?

22 A Yes.

23 Q Does that -- the less than 10 days, does  
24 that refer to students who have a high rate of  
25 absenteeism or students who are withdrawn at some

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1 point?

2 A It could be -- we don't, we don't unenroll  
3 them for absenteeism, but it could be the child  
4 moved or something like that.

5 Q Okay. I'd like to show you another  
6 document that will be marked as Plaintiff's Exhibit  
7 665, but this is an electronic document.

8 (WHEREUPON, Plaintiff's Exhibit-665 was  
9 marked for identification.)

10 BY MS. GARDNER:

11 Q I'm going to move this a little bit closer  
12 so you can see. I'll share.

13 Can you see that?

14 A Yes, I can.

15 Q This is a spreadsheet that was produced to  
16 the United States by the North Metro GNETS program  
17 in response to the United States subpoena for  
18 documents?

19 A Yes.

20 Q The internal temporary reference that we  
21 have as assigned to this is North Metro\_Temp\_002628.

22 I do want to represent to you that we have  
23 redacted the fields showing each student's first and  
24 last name, their student ID number, and their date  
25 of birth to protect privacy.

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1 A Okay.

2 Q But would you look at the spreadsheet and  
3 let me know if you recognize it?

4 A I do.

5 Q And am I correct that this shows all of  
6 the students enrolled in the North Metro GNETS  
7 programs whose home school system is Gwinnett  
8 County?

9 A Yes. That is the BRIDGE and Oakland  
10 Meadows, yes.

11 Q And then it contains tabs that show that  
12 information for the 2019-20, the 2020-21, the  
13 2021-22 school years?

14 A Yes.

15 Q This contains a number of fields. I just  
16 wanted to ask you in particular about one.

17 Do you see the field called "Duration"?

18 A Yes.

19 Q What does that signify?

20 A The number of days I guess they were in  
21 the program or in school.

22 Q So is this the number of days they were in  
23 school for a given school year?

24 A Yes.

25 Q And so, for example, on this spreadsheet,

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1 which is the 2021-22 school year -- and this may be  
2 a function of the date that this was produced.

3 Do you see the --

4 A The date column?

5 Q -- in 27?

6 A What is the top of the -- what is it  
7 titled?

8 Q This field.

9 A Duration. I have no idea. My secretary  
10 fills this out. I'm sorry.

11 Q And correct that for these particular  
12 tabs, it shows the date of enrollment for that  
13 particular school year?

14 A Yes.

15 Q Okay.

16 Would you like me to go back up?

17 A I'm looking at duration and I'm just  
18 trying to recall what the -- I think that is the  
19 number of weeks in school. It looks like -- looking  
20 at those numbers, it may be the number of weeks.

21 Q Okay.

22 A But I -- I'm not sure.

23 Q Okay. Does North Metro regularly track  
24 which North Metro GNETS students graduate each year?

25 A That is done by the LEA, because our



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1 students, when they graduate from GNETS, they  
2 actually are graduating from their school, since  
3 we're part of the program.

4 Q Does GNETS track whether students who end  
5 up graduating pursue post-secondary education?

6 A No. That's tracked by the LEA.

7 Q Does GNETS regularly track the number of  
8 North Metro students who drop out?

9 A No, we don't track that. That again is  
10 tracked by the LEA, since the students are students  
11 of the district, not of GNETS. If that makes sense.

12 Q Does North Metro GNETS record the  
13 attendance of each of its students on a daily basis?

14 A Yes.

15 Q And is that done using some sort of an  
16 electronic database?

17 A Yes. The Infinite Campus in Atlanta and  
18 Fulton, and then Synergy for Gwinnett.

19 Q In order for a student to count as in  
20 attendance, what percent or proportion of the  
21 instructional day do they have to be physically  
22 present?

23 A It's based on each individual school  
24 district. I think for most of our school districts,  
25 if they come to school at the beginning of the day

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1 and they stay until 12 o'clock, I think they count  
2 that as a full day.

3 Q So it's --

4 A But it depends on the school district's  
5 rules for that.

6 Q Are students ever asked to stay home or  
7 sent home due to problem behavior?

8 A No.

9 Q Are students --

10 A Not unless they're suspended.

11 Q Are students ever asked to stay home or  
12 sent home due to lack of staff onsite?

13 A No.

14 Q On average, what percentage of North Metro  
15 GNETS students are present on any given day?

16 A It depends on each location. So that's --  
17 would be a site coordinator question, because  
18 they're like my building principals in 21 locations.

19 Q Does North Metro GNETS attendance rates  
20 affect any funding that you receive?

21 A No.

22 MS. GARDNER: I'd like to have this  
23 document marked as Plaintiff's Exhibit 665.

24 I'm sorry, 666. Thank you.

25 (WHEREUPON, Plaintiff's Exhibit-666 was

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1 marked for identification.)

2 BY MS. GARDNER:

3 Q You have been handed what has been marked  
4 as Plaintiff's Exhibit 666.

5 This is an email from you to Vickie  
6 Cleveland with a copy to Tasha Wiggins, dated  
7 September 26, 2018, with a subject "North Metro  
8 GNETS Requested Data," and it includes one  
9 attachment that is an Excel file with the file name  
10 "North Metro GNETS Data\_9-20-18.

11 The Bates-stamp on this document is  
12 GA00333801.

13 Do you recognize this?

14 A Yes, but my data sheet is blank, so I'm  
15 not really sure.

16 Q Okay. So the attachment was provided in  
17 Excel, so I'm going to show the attachment to you  
18 electronically.

19 A Okay.

20 Q I'll share that.

21 Can you see this document?

22 A Yes.

23 Q The information that you sent to Ms.  
24 Cleveland, is that information that Ms. Cleveland  
25 requested that North Metro GNETS provide?

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1 A Yes.

2 Q And was the spreadsheet provided to North  
3 Metro for North Metro to fill in the fields of that  
4 spreadsheet?

5 A Yes.

6 Q And am I correct in understanding that all  
7 of the other regional GNETS programs were also asked  
8 to do that?

9 A Yes.

10 Q And in this email you're sending the  
11 spreadsheet back with North Metro's data filled in?

12 A Yes.

13 Q And according to what you reported, and  
14 this is FY18, nine students graduated from North  
15 Metro?

16 A Yes.

17 Q That same fiscal school year, 39 students  
18 transitioned back to their home school district?

19 A Yes.

20 Q When it says that that those students  
21 transitioned back to their home school district,  
22 does that mean that those students were fully in the  
23 general education environment?

24 A Yes.

25 Q The data you reported also notes that --

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1 and this says based on FY19, that 162 students were  
2 enrolled in the North Metro GNETS center?

3 A Yes.

4 Q And then it says based on FY19, 74  
5 students were enrolled in school-based locations  
6 within North Metro GNETS?

7 A Yes.

8 Q There's a field in this spreadsheet for  
9 the number of students participating in extra  
10 curriculum activities --

11 A Yes.

12 Q -- in FY19. Do you see that?

13 A Yes.

14 Q North Metro left this field blank when  
15 sending this document back to Ms. Cleveland?

16 A Yes.

17 Q Why was that?

18 A Well, because, again, we don't track this  
19 information. So I had to try to hunt it down by  
20 asking parents and students and all of that, and I  
21 just did not have access to the information. So I  
22 could not report accurately on how many of the  
23 students were participating in extracurricular  
24 activities.

25 Q Are you familiar with the Apex program?

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1 A Yes.

2 Q What is the Apex program?

3 A It's a program, to my understanding, where  
4 they provide mental health services to students and  
5 families that are a part of the program.

6 Q And do you understand that those mental  
7 health services are provided to students in schools?

8 A Yes.

9 Q Are there any North Metro GNETS students  
10 who access Apex services?

11 A I know that we try to get a collaborative  
12 in our Gwinnett schools to have those services  
13 provided but I don't think they were through Apex.  
14 My understanding of Apex is when it came about, it  
15 was to provide mental health services for general ed  
16 students, not special ed students. That's my  
17 understanding of the Apex program.

18 Q Okay. So your understanding of the Apex  
19 program is that special ed students are not eligible  
20 for that particular program?

21 A That's my understanding. I'm not very  
22 familiar with it, but that is what I understand.

23 Q When you say you tried to get a  
24 collaborative in Gwinnett schools to have those  
25 services, are you referring to mental health

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1 services in schools?

2 A Yes.

3 Q And you said that was not through Apex,  
4 though?

5 A They have two different agencies that they  
6 were looking for, and the reason I got the idea was  
7 because some of their other schools were using Apex  
8 services and some other vendors to provide mental  
9 health, and they were based in the schools.

10 So basically they didn't work for the  
11 school, but the County provided them with office  
12 space. And so we started having those conversations  
13 right before COVID. COVID's gone on for a while, so  
14 we are still trying to have those conversations.

15 So at this point those services still are  
16 not being provided at a regular basis. On a regular  
17 basis.

18 Q And these conversations you were having  
19 about this collaboration, who were those  
20 conversations with?

21 A The special ed directors in Gwinnett.

22 Q And when you say that there were -- there  
23 was an outside agency that would come in and provide  
24 the services but be housed at school facilities?

25 A That was the hope, yes.

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1 Q What were those outside agencies that you  
2 were potentially thinking of collaborating with?

3 A Of course Gwinnett calls it something  
4 different. I don't recall right now, but I will try  
5 to recall the names of those agencies and share them  
6 with you.

7 Q Were those government agencies?  
8 Independent, private agencies?

9 A Some of the similar agencies that like are  
10 part of the LIPT, the Local Interaction Planning  
11 Team. But even though they have the CSBs that are  
12 across the State, some of them serve different  
13 districts.

14 So the agencies that Gwinnett was having  
15 those conversations with served Gwinnett County  
16 family, students and families.

17 Q Were these CSBs, like covering the area of  
18 Gwinnett?

19 A I don't recall.

20 Q So just to be clear, you mentioned that  
21 it's your understanding that special education  
22 students can't access Apex services. So do you know  
23 whether any North Metro GNETS students are currently  
24 accessing Apex services?

25 A Not to my knowledge.



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1 Q Okay.

2 A Again, my very limited knowledge on Apex  
3 is I thought that that program was developed for  
4 students that were in a general ed program. Now, if  
5 the program is housed in a school with special ed  
6 students, I would assume they have access, but,  
7 again, I don't think it was created for students  
8 with IEPs.

9 Q Okay.

10 MS. GARDNER: I'm going to ask the court  
11 reporter to mark three documents at once.

12 The first one I'm going to ask be marked  
13 as Plaintiff's Exhibit 667.

14 (WHEREUPON, Plaintiff's Exhibit-667 was  
15 marked for identification.)

16 MS. GARDNER: The second one I will ask to  
17 be marked as Plaintiff's Exhibit 668.

18 (WHEREUPON, Plaintiff's Exhibit-668 was  
19 marked for identification.)

20 MS. GARDNER: And the third one I will ask  
21 be marked as Plaintiff's Exhibit 669.

22 (WHEREUPON, Plaintiff's Exhibit-669 was  
23 marked for identification.)

24 MS. GARDNER: And, for the record,  
25 Plaintiff's Exhibit 667 is Bates-stamped

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1 GA05058857.

2 Plaintiff's Exhibit 668 is Bates-stamped  
3 GA0508776.

4 Sorry. Plaintiff's Exhibit 668 is  
5 Bates-stamped GA05058891.

6 And Plaintiff's Exhibit 669 is  
7 Bates-stamped GA05087765.

8 BY MS. GARDNER:

9 Q Starting with Plaintiff's Exhibit 667,  
10 correct that this is an email thread between you and  
11 Nakeba Rahming from February 2016, with the subject  
12 "RE: Attorney-Client Privilege Document"?

13 A Uh-hum. (Affirmative.)

14 Yes.

15 Q Do you recognize this email thread?

16 A I don't recognize it, but I see my name  
17 and time-stamped on it, yes.

18 Q And if you look on the second page of this  
19 document, the earliest email in the thread, am I  
20 correct that that is an email that Nakeba Rahming  
21 writes on February 1st, 2016, and begins the email  
22 with "Hello GNETS Directors"?

23 A Yes.

24 Q Do you see that?

25 A Uh-hum. (Affirmative.)

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1 Q And the remaining body of the email is  
2 blacked out, correct?

3 A Correct.

4 Q At the very bottom of the page, it does  
5 show there was an attachment to that initial email  
6 that was a Word document. Do you see that?

7 A Yes.

8 Q And it says "GNETS Directors privileged  
9 attorney-client form"?

10 A Yes.

11 Q You respond to Ms. Rahming on February 13,  
12 2016, correct?

13 A Yes.

14 Q And the body of your email, apart from  
15 your greeting "Hi Nakeba," is blacked out as well?

16 A Yes.

17 Q And am I correct that the bodies of the  
18 three emails exchanged after that, in the thread  
19 between you and Ms. Rahming, are also blacked out?

20 A Correct.

21 Q At the time of this email exchange, did  
22 you consider North Metro GNETS to be legally  
23 represented by Nakeba Rahming or lawyers at the  
24 Georgia Department of Education?

25 A Yes.

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1 Q Are the lawyers for the Georgia Department  
2 of Education representing you here today?

3 A I assume so. I guess.

4 I mean they're on the Zoom. So I assume.  
5 I don't know what their role is.

6 Q Okay.

7 A My main attorney is Beth Morris, but...

8 MS. GARDNER: So I would like to put a  
9 note on the record, the United States  
10 disagreement with the assertion of any  
11 privilege over the contents of this email. The  
12 email is between an employee of the Georgia  
13 Department of Education and a director of a  
14 GNETS program. The State of Georgia has taken  
15 the position in this litigation that it does  
16 not represent the GNETS programs, any of their  
17 fiscal agents or directors.

18 So we request that the State of Georgia  
19 produce the unredacted version of this email  
20 prior to the close of discovery.

21 We also request that the unredacted  
22 version of Ms. Rahming's February 1, 2016 email  
23 to the GNETS directors attaching the Word  
24 document with the file name GNETS Directors  
25 Privilege Attorney-Client Form be produced in

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1 unredacted form with the included attachment  
2 prior to the close of discovery.

3 BY MS. GARDNER:

4 Q Moving on to Plaintiff's Exhibit 668, this  
5 is an email thread between you and Nakeba Rahming  
6 from April 2016 with the subject line "Re: North  
7 Metro GNETS File Audit: Week of March 28, 2016  
8 through April 1, 2016, Attorney-Client Privilege?

9 A Yes.

10 Q Do you recognize this?

11 A Yes.

12 Q There are also attorneys of this email  
13 that are blacked out; is that correct?

14 A Yes.

15 Q The only thing not blacked out is a  
16 discussion about the beach?

17 A Yes.

18 Q You said earlier that Nakeba Rahming was  
19 the director of the GNETS program at the Georgia  
20 Department of Education?

21 A Yes.

22 Q To your knowledge, is Ms. Rahming an  
23 attorney?

24 A No.

25 Q You generated the first email in this

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1 thread, correct?

2 A Yes.

3 Q And so you created the subject line here  
4 that includes "attorney-client privilege"?

5 A Uh, I guess so.

6 Q What prompted you to include  
7 "attorney-client privilege" language in this subject  
8 line?

9 A I guess because she sent me a document  
10 that said attorney -- was I not replying back to  
11 that? I'm trying to -- when I look at this email  
12 from February 1st on document 667, it has a document  
13 that it looks like it came from Nakeba Rahming,  
14 correct?

15 Q Yes. So is it your understanding that  
16 this April 2016 email is related to the February  
17 2016 email?

18 A Yes. That's what it looks like to me.

19 Q Okay. Was there a file audit of the North  
20 Metro GNETS program in 2016?

21 A Probably, yes.

22 Q Who performed that file audit?

23 A I'm sure 2002 Nakeba Rahming and probably  
24 Vickie Cleveland if she was there at that time.

25 Q And what was the nature of the file audit?

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1           A     At that point they were going through  
2     looking at all of the documents that were being  
3     requested by the DOJ, or I don't recall specifically  
4     unless it was a part of the compliance review  
5     process.

6           Q     Have there been other file audits of the  
7     North Metro GNETS program since 2016?

8           A     Probably. I can't be sure, but...

9           Q     Have you been requested to conduct IEP  
10    file reviews?

11          A     I think so. I think the -- one of the  
12    previous emails show that I was asking about the  
13    three students that they wanted the IEP reviews.

14               MS. GARDNER: I'd like to note on the  
15    record, similar to Plaintiff's Exhibit 667,  
16    that the United States disagrees with the  
17    assertion of any privilege over the contents of  
18    this email since the email is between an  
19    employee of the Georgia Department of Education  
20    and a director of a GNETS program, and the  
21    State has taken the position in this litigation  
22    it does not represent the GNETS programs, any  
23    of their fiscal agents or directors.

24               We request that the unredacted version of  
25    this email also be produced prior to the close

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1 of discovery.

2 And for the record sake, again, the  
3 Bates-stamp on this document is GA05058891.

4 BY MS. GARDNER:

5 Q Moving to Plaintiff's Exhibit 669, this is  
6 an email from you to Lisa Futch, Nakeba Rahming,  
7 Deborah Gay, and Pat Wolf, dated February 3rd, 2016.

8 Do you recognize this?

9 A Yes.

10 Q And this document is Bates stamped  
11 GA05087765.

12 In this email you respond to an email from  
13 Lisa Futch, in which she note that she will be  
14 unable to make a meeting regarding the strategic  
15 plan?

16 A Yes.

17 Q And is this reference to the strategic  
18 plan in reference to the GNETS Strategic Plan?

19 A Yes.

20 Q In your response there is a specific  
21 portion of the response that is blacked out,  
22 correct?

23 A Yes.

24 MS. GARDNER: For the same reasons that we  
25 previously explained on the record, to the



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1 extent that the redaction of this email is for  
2 privilege, the United States disagrees with the  
3 assertion of privilege in this instance, given  
4 the presence of Georgia Department of Education  
5 employees and GNETS directors on the same  
6 communication, and we request that the State  
7 produce the unredacted version of this email  
8 prior to the close of discovery.

9 BY MS. GARDNER:

10 Q Ms. Holifield -- Dr. Holifield, were you  
11 present for site visits to the North Metro GNETS  
12 program locations in which experts for the United  
13 States toured facilities and observed classrooms in  
14 May of 2022?

15 A Yes.

16 Q Were you present for a visit to the Buice  
17 Center?

18 A Yes.

19 Q For a visit to Centennial High School?

20 A Yes.

21 Q For a visit to Tri Cities High School?

22 A Yes.

23 Q For a visit to Hamilton Homes Elementary  
24 School?

25 A Yes.

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1 Q I believe there was also a visit to Haynes  
2 Bridge Middle School. Is that correct?

3 A Yes.

4 Q Who else was present from North Metro for  
5 those site visits?

6 A My RESA director, Dr. Leigh Ann Putman,  
7 and my site coordinator.

8 Q And who is your site coordinator?

9 A It depends on the different locations you  
10 just named. I mean if you name them again, I can  
11 tell you who's who.

12 Q That's fine.

13 A Okay.

14 Q Was anyone present for those visits from  
15 the county school systems that North Metro service?

16 A Yes. Their attorneys.

17 Q And anybody besides the attorneys?

18 A I think in a couple of the visits the  
19 special ed director was present as well.

20 Q How long before those May 2022 site visits  
21 occurred did you learn that they would be happening?

22 A Probably a couple of weeks to a month,  
23 maybe.

24 Q And how did you first learn about the  
25 visits?

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1           A       The information that was sent over from my  
2 attorney.

3           Q       Did you do anything to prepare for those  
4 visits?

5           A       Just do my job.

6           Q       Did you have any conversations with anyone  
7 on your staff about the visits in advance of their  
8 occurrence?

9           A       Maybe.

10          Q       Who would you have had conversations about  
11 that?

12          A       Probably just another GNETS director  
13 saying what in the world is happening, what's this  
14 going to be like.

15          Q       Did you have any conversations with any of  
16 your teachers about the visits that were  
17 anticipated?

18          A       Yes.

19          Q       And what was the nature of those  
20 conversations?

21          A       Generally, just to let them know we're  
22 going to have visitors in the building and to do  
23 their job and keep working.

24          Q       Did you put in any special maintenance  
25 requests in advance of those visits?

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1 A No.

2 Q Were there any modifications to student  
3 class schedules made in advance of those visits?

4 A No.

5 Q To students' schedules themselves?

6 A No.

7 Q Did you or anyone on your staff have any  
8 conversations with students or their families about  
9 the visits in advance --

10 A No.

11 Q -- of their occurrence?

12 A Not other than students to let them know  
13 we're going to have visitors in the building and  
14 keep doing what they normally do, and that was just  
15 sporadic.

16 Q Were any students invited or requested to  
17 stay home on the date that the United States site  
18 visits occurred?

19 A No.

20 Q Prior to the United States and its expert  
21 beginning the site visit at the Buice Center, did  
22 you participate in a meeting on that day with your  
23 counsel Regan Sauls; the principal of the Buice  
24 Center, Kim Mankin; counsel for Gwinnett County,  
25 Victoria Sweeney; the Gwinnett County special

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1 education director, Nicole White; Shaun Owen of the  
2 Georgia Department of Education; and the State's  
3 counsel Danielle Hernandez?

4 A We were all present that day for the  
5 visit.

6 Q And did you-all meet in advance of the  
7 visit?

8 A We all gathered in the same room prior to  
9 the, the attorneys arriving.

10 Q And did you all discuss the site visit  
11 during that time?

12 A No. Not really.

13 Q So there wasn't a meeting ongoing at the  
14 time that the United States and its expert arrived  
15 for the tour?

16 A I think we had a visit about the schedule,  
17 how we were going to go and which way -- which  
18 classrooms to go to based on the subpoena, what you  
19 all asked that you wanted to see. So it was a  
20 meeting about just making sure that the building  
21 principals took -- we went on the different  
22 locations to everything that you all had mentioned  
23 in the letter.

24 Q Did the group that you were meeting with  
25 request that the United States and its expert give

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1 the group a few minutes to wrap up its meeting?

2 A I don't recall.

3 Q And did you have similar meetings prior to  
4 the beginning of the site visit at Hamilton Homes  
5 Elementary School?

6 A Same conversations. Just going over the  
7 schedule based on the subpoena which areas you all  
8 wanted to see.

9 Q And was that meeting ongoing at the time  
10 that the United States and its expert arrived for  
11 the tour?

12 A Probably.

13 Q Did you request the United States and its  
14 expert give the group you were meeting with a few  
15 minutes to wrap up?

16 A I don't recall.

17 Q That meeting at Hamilton Homes, your  
18 counsel Regan Sauls was present for that?

19 A Yes.

20 Q And the principal of Hamilton Homes,  
21 Andrea Grainger?

22 A Yes.

23 Q Counsel for Fulton County schools, Jeff  
24 Daniel?

25 A Yes.

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1 Q Shaun Owen of the Georgia Department of  
2 Education?

3 A Yes.

4 Q And Alexa Ross, counsel for the state?

5 A Yes.

6 Q Samad Knight was also present for that  
7 meeting?

8 A Yes, my site coordinator.

9 Q You talked a lot about GNETS today. I'm  
10 wondering whether you have identified any ways that  
11 you think access to educational and therapeutic  
12 services for students served, if GNETS could be  
13 improved?

14 A Could you repeat that?

15 Q Sure. Are there any ways that you think  
16 access to educational and therapeutic services for  
17 GNETS students could be improved?

18 A I think just having more of the  
19 therapeutic support services available and to make  
20 sure that we follow, you know, IDEA, because we are  
21 part of the full continuum of services.

22 Q What would it take to have more  
23 therapeutic support services available?

24 A It just depends on the needs of the  
25 students and being able to provide more school

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1 psychologists, social workers and behavioral  
2 interventionists to do the same work that we're  
3 doing now.

4 Q What would North Metro in particular need  
5 in order to be able to do that?

6 A I think the same. I think the staffing  
7 pattern and the services that we provide are  
8 effective. I just think we need more of them.  
9 Again, like I said before, even though our numbers  
10 are less, the mental health needs of our students  
11 are greater.

12 Q Anything apart from that that would be on  
13 a wish list you might have for North Metro GNETS?

14 A Not that I could think of.

15 MS. GARDNER: One more document and I  
16 think we're pretty...

17 I'd like to have this marked as  
18 Plaintiff's Exhibit 670.

19 (WHEREUPON, Plaintiff's Exhibit-670 was  
20 marked for identification.)

21 BY MS. GARDNER:

22 Q You've been handed what's been marked as  
23 Plaintiff's Exhibit 670. This is an email from  
24 Vickie Cleveland to you and others dated November  
25 14, 2018?



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1 A Yes.

2 Q With the subject line "2017-18 Milestone  
3 data."

4 This contains two Excel attachments. The  
5 first is an Excel file with file name "Copy of  
6 fy2018\_gnets\_milestones-eoc."

7 And the second file name "Copy of  
8 fy2018-gnets\_milestones-eog."

9 And this document is Bates-stamped  
10 GA00336618.

11 Do you recognize this?

12 A Yes.

13 Q In this email Ms. Cleveland says: "See  
14 the attached 2017-18 EOG and EOC milestones data.  
15 We will discuss further. I look forward to seeing  
16 everyone in the morning."

17 Do you see that?

18 A Yes.

19 Q What is EOG milestones data?

20 A End of grade, and end of course.

21 Q What's the difference between end of grade  
22 and end of course milestones?

23 A The assessments are different. So certain  
24 grade levels are required by the State to have an  
25 end of course, and others are end of grade.

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1 Q I want to turn to the attachments, which  
2 are electronic, so I'm going to show the first  
3 attachment.

4 This is the end of course milestones data.  
5 Do you see this document?

6 A Yes.

7 Q Am I correct that this shows all of the  
8 various GNETS programs?

9 A Yes.

10 Q With end of course and subject area.  
11 It shows the total number of students that  
12 were tested and those test results, depending on  
13 whether the student was proficient or better or not  
14 quite proficient?

15 A Yes.

16 Q I also want to show you the second  
17 attachment and get you to confirm that one as well.  
18 Do you see this attachment?

19 A Yes.

20 Q And am I correct that this is the -- a  
21 similar spreadsheet but showing end of grade  
22 milestones data?

23 A Correct.

24 Q Do you see the assessment type here?

25 A Yes.

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1 Q And then it would show for each GNETS  
2 program the total number of students tested, what  
3 the subject code is, what the grade level, and then  
4 how many students tested proficient or less than  
5 proficient or more than proficient?

6 A Yes.

7 Q Correct that North Metro's data is  
8 included in here as well?

9 A Yes.

10 Q Did the discussion of this data that Ms.  
11 Cleveland said would happen in her email occur?

12 A Yes.

13 Q Was that done at a GNETS directors  
14 meeting?

15 A Yes.

16 MS. GARDNER: That means my time is up.  
17 BY MS. GARDNER:

18 Q Ms. Cleveland was present for that  
19 conversation as well?

20 A Yes.

21 Q Was anyone else from the Georgia  
22 Department of Education present?

23 A Typically not unless she had someone from  
24 the DOE come in and train us on something.  
25 Sometimes she would invite guest speakers in to

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1 train us on something that the State was doing.

2 Q And do you remember just briefly what the  
3 nature of that discussion was about the milestones  
4 data with the GNETS directors?

5 A We were just to look at the data and  
6 analyze it to see where our students were and to try  
7 to make sure that we implemented more academic  
8 interventions so we could move kids into the  
9 proficient and above area.

10 Q Okay. I'll stop sharing that.

11 MS. GARDNER: Well, thank you very much  
12 for your time today.

13 A Thank you.

14 MS. GARDNER: You are done and free to go.

15 THE WITNESS: Thank you.

16 THE VIDEOGRAPHER: This concludes this  
17 video deposition.

18 The time is 5:49 p.m., and we are off the  
19 record.

20 MR. JOHNSON: The State of Georgia had a  
21 few questions that we would like to have an  
22 opportunity to ask.

23 THE VIDEOGRAPHER: The time is 5:49 p.m.,  
24 and we are on the record.

25 MS. JOHNSON: We are on the record?

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1 THE VIDEOGRAPHER: Yes. Yes.

2 MR. JOHNSON: Okay. Thank you.

3 EXAMINATION

4 BY MS. JOHNSON:

5 Q Ms. Holifield, my name is Melanie Johnson.  
6 I represent the State of Georgia. I promise I will  
7 keep you here for less than five minutes. I just  
8 have a few follow-up questions.

9 And I apologize, I think I just called you  
10 Ms. Holifield. I meant to say doctor.

11 A That's fine.

12 Q I just have a few questions. The first  
13 one is, does the State participate in your program's  
14 personnel decisions?

15 A No.

16 Q Okay. And you mentioned earlier that you  
17 report to Leigh Ann Putman, the executive director  
18 of Metro RESA. Is that right?

19 A That's correct.

20 Q Is she also the individual who hired you?

21 A No. She was working at -- in a different  
22 position at Metro RESA. At that time there was  
23 another RESA executive director. But she was a part  
24 of the hiring process.

25 Q Okay. So it was the executive director of

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1 the Metro RESA who hired you, just a different one  
2 than Leigh Ann Putman?

3 A Yes.

4 Q And does the executive director also  
5 conduct your evaluations?

6 A Yes.

7 Q Okay. Does the State of Georgia conduct  
8 any evaluations of you or your staff?

9 A Just the strategic plan.

10 Q Okay. What about through the TKES and  
11 LKES process?

12 A No.

13 Q And are you aware of who makes up the  
14 members of an IEP team?

15 A Yes.

16 Q Is the State of Georgia ever a member of  
17 an IEP team?

18 A No.

19 Q To your knowledge?

20 A No.

21 MS. JOHNSON: All right, those are all my  
22 questions.

23 Thank you very much. I appreciate these  
24 extra few minutes of your time.

25 THE WITNESS: Thank you.

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1 MS. JOHNSON: Have a good evening.

2 THE WITNESS: You too.

3 THE VIDEOGRAPHER: This concludes this  
4 video deposition.

5 The time is 5:52 p.m., and we are off the  
6 record.

7 (Whereupon, the deposition concluded at  
8 5:52 p.m.)  
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C E R T I F I C A T E

STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing transcript of CASSANDRA HOLIFIELD, Ph.D. was taken down, as stated in the caption, and the questions and answers thereto were reduced by stenographic means under my direction;

That the foregoing Pages 1 through 334 represent a true and correct transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in this case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 8th day of December, 2022.

*Wanda L. Robinson*

Wanda L. Robinson, CRR, CCR No. B-1973  
My Commission Expires 10/11/2023



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D I S C L O S U R E

STATE OF GEORGIA ) 12/01/22 VIDEOTAPE DEPOSITION OF  
FULTON COUNTY CASSANDRA HOLIFIELD, Ph.D.

Pursuant to Article 10.B of the Rules and  
Regulations of the Board of Court Reporting  
of the Judicial Council of Georgia, I make the  
following disclosure:

I am a Georgia certified court reporter.  
I am here as a representative of Esquire Deposition  
Solutions, LLC, and Esquire Deposition Solutions,  
LLC was contacted by the offices of U.S. Attorney's  
Office to provide court reporter services for this  
deposition. Esquire Deposition Solutions, LLC will  
not be taking this deposition under any contract  
that is prohibited by O.C.G.A. 9-11-28 (c).

Esquire Deposition Solutions, LLC has no  
contract/agreement to provide court reporter  
services with any party to the case, or any counsel  
in the case, or any reporter or reporting agency  
from whom a referral might have been made to cover  
this deposition.

Esquire Deposition Solutions, LLC will  
charge the usual and customary rates to all parties  
in the case, and a financial discount will not be  
given to any party to this litigation.

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ERRATA SHEET FOR THE TRANSCRIPT OF:

Deponent Name: CASSANDRA HOLIFIELD, Ph.D.

Case Caption: United States of America vs. State  
of Georgia

Case No. : 1:16-cv-03088-ELR

I do hereby certify that I have read all  
questions propounded to me and all answers given by  
me on the 1st day of December, 2022, taken before  
Wanda L. Robinson, and that:

\_\_\_\_\_ 1) There are no changes noted.

\_\_\_\_\_ 2) The following changes are noted:

Pursuant to state rules of Civil Procedure  
and/or the Official Code of Georgia Annotated  
9-11-30(e), both of which read in part: Any changes  
in form or substance which you desire to make shall  
be entered upon the deposition with a statement of  
the reason given for making them.

Accordingly, to assist you in effecting  
corrections, please use the form below:

CORRECTIONS:

Page	Line	Change	Reason For Change

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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me. Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

\_\_\_\_\_  
Signature of Deponent

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this \_\_\_\_\_ day of \_\_\_\_\_, 2022, and executed the above certificate in my presence.

\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

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